



Transport Technology Forum (TTF) GDPR Strategy

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Introduction

The General Data Protection Regulation (GDPR) represents possibly the most significant change to data protection laws in over 20 years. The new regulations will impact every part of our organisation, and as such we accept our responsibilities and obligations of this important change.

Transport Technology Forum (TTF) regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between the company and those with whom it carries out business. The company therefore fully endorses and adheres to the Principles of the General Data Protection Regulation.

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times. The Company is exposed to potential fines of up to EUR 20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher and depending on the breach, for failure to comply with the provisions of the GDPR.

Our GDPR Obligations

Transport Technology Forum (TTF) understands that the focus on individual rights (as well as transparency and accountability for the collection and handling of personal data) places UK residents and their rights at the heart of GDPR. Therefore, we will ensure that our organisation makes all the necessary changes in order to support the GDPR regulations and act at all times in the spirit of the GDPR. We will at all times process data lawfully, fairly, and transparently; respecting the rights of our data subjects; and ensuring we maintain the integrity and confidentiality of any data we process. We will minimise the amount of data we collect and the amount of time we process any data we collect. As such, we will consider all aspects of our data processing activities, storage and disposal of all personal data.

In addition, we accept that the new regulations strengthen compliance requirements including new rules on consent and clear definition of how data is to be used. We will adopt a Privacy by Design ethos and complete Impact Assessments (where necessary) to understand how best to guarantee data is kept secure.

We also accept the need for transparency, including the processing of Subject Access Requests and Breach Disclosure requirements to notify authorities; and where necessary, data subjects within 72 hours.

Key Strategy Principles

- We will use personal data in the most efficient and effective way to deliver better services
- We will collect only adequate, relevant data limited to what is necessary in relation to the

purposes for which they are processed

- We will process data lawfully, fairly and in a transparent manner in relation to individuals collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research
- We will be a responsible custodian of data including customers, employees, third-parties, and any other personally identifiable data
- We will assign clear ownership for data privacy across the company starting at the highest levels, with clear responsibility and accountability for all aspects of data security throughout the organisation
- We will establish a formal inventory of data processing operations and supporting systems that collect, process and store personal data
- We will review and verify the legal basis for collecting and processing personal data; as well as the legal means for any cross-border (outside United Kingdom) transfers and communicate this clearly with all data subjects
- We will regularly review all systems and processes, identify gaps and develop a plan to achieve compliance within the new regulations
- We will ensure data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- We will ensure data is accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified
- We will ensure data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data
- We will review partners and vendors to establish current contract terms and agreed upon data protection controls
- We will ensure we can support individuals exercising their rights under the GDPR
- We fully support the requirements of the GDPR and will ensure appropriate resources and funding are available to meet these obligations in preparation for implementation
- Where data is transferred outside of the UK we will ensure we take appropriate precautions to protect the data to an equivalent level to that provided in the UK
- We are adopting a risk managed approach and acknowledge that there may be gaps in implementation. However, we will have completed high priority tasks, review and made significant changes in order to support the GDPR

Handling personal data

Transport Technology Forum (TTF) will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way to deliver better services
- Strive to collect and process only the data or information which is needed
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted
- Strive to ensure information is accurate and not keep information for longer than is necessary
- Securely destroy data which is no longer needed
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data)
- Ensure that information is not transferred abroad without suitable safeguards
- Ensure that there is general information made available to the public of their rights to access information
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulations

DPO Requirement

We have evaluated the requirement for a designated Data Protection Officer as in Article 37 of the GDPR and other related clauses. We recognise that although we process data we do not meet the criteria for mandatory appointment of a DPO.

As such we have determined we do not need to appoint a DPO. This will of course not in any way diminish our commitment to GDPR or adherence to the principles.

Processing Of Special Categories Of Data

We have completed a review of the data we process and have determined that we do process special categories of data as defined in Article 9 or Article 10 and as such we will take appropriate precautions to protect that data.

Third Country Transfers Of Data

We have completed a review of our processes and data we process and have determined that we do transfer data outside the UK. As such, the restrictions on the transfer of personal data to third countries or international organisations apply and we will take appropriate steps to ensure we meet these regulations and ensure the required safeguards are in place.

Processing Data About Children

We have completed a review of our processes and data we process and have determined that we do not process data about children. As such, the regulations do not apply. However, we accept that a child's personal data merits particular protection under the GDPR and will review this regularly.

Legitimate Interest Assessment

Due to the volumes of data stored we have carefully considered the lawful basis under which we collect, store, and process this data. We have completed a legitimate interest balancing assessment and determine that our interests in operating our business, providing a service to our customers, offering opportunities to the data subjects, and making a profit are a legitimate basis for processing when compared to the impact on the rights of the data subjects as defined in.

We have completed a three-step assessment

- Legitimate interest – considered as above
- Necessity test – this is a fundamental part of our business, without this processing we have no product or service to offer.
- Balancing test – we have considered the rights of the data subject, their expectations, impact on them and their families and how we can protect their interests and rights under the GDPR and determine that processing is acceptable.

This is an important consideration and will be reviewed regularly.

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