

A&P GDPR Compliance Statement

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a privacy and data protection regulation in the European Union (EU) and will be enforceable from 25 May 2018 and requires no enabling legislation so automatically becomes binding and applicable on that date.

The GDPR imposes new obligations on organisations that control or process relevant personal data and introduces new rights and protections for EU data subjects.

The GDPR applies to data processing carried out by organisations operating within the EU. It also applies to organisations outside the EU that offer goods or services to individuals in the EU.

A&P places a high importance on information security and within our Group we already comply with a number of standards that also focus on information data security.

A&P will comply with the GDPR as a processor and controller of data and has been planning and developing a programme of works which will deliver what is required by the legislation. This will involve working with our suppliers and partner organisations to ensure they can meet these obligations.

As we work towards compliance, we have engaged with an external training provider and our legal team to ensure we deliver best practice in compliance, and our programme up to 25 May 2018 falls into these areas:

- GDPR compliant policies and procedures have been created and are in place.
- We will undertake training and awareness briefing for all staff on GDPR.
- Controls & Gap Analysis: running alongside the work already underway, we will be reviewing the controls in place, as required.
- Supplier & Partner relationships: where relevant and related, we will be using all reasonable endeavours to ensure that our third party and suppliers are complying with the GDPR.
- Technology: we will be reviewing our technology platforms to analyse their operation, security, compliance in order to ensure that they meet the standards we have laid down and identify any gaps and risks.

A&P's Senior Human Resources Manager and our Senior Management Team will continue to monitor the programme up to the target date of 25 May 2018 and beyond.

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