

EQ Boardroom Discussion Forum

1st February 2018

Running Order

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Introduction

02

Overview
of GDPR

03

Equiniti
Products
under GDPR

04

Delivering
Data
Protection

05

Q&A

Presenters



Mark Taylor

Chief Customer Officer
Equiniti



Adam Green

Chief Risk Officer
Equiniti



Jennifer Rudman

Strategic Development
Manager



Steve Banfield

Industry Director
Equiniti

Overview of GDPR

01

Timeline

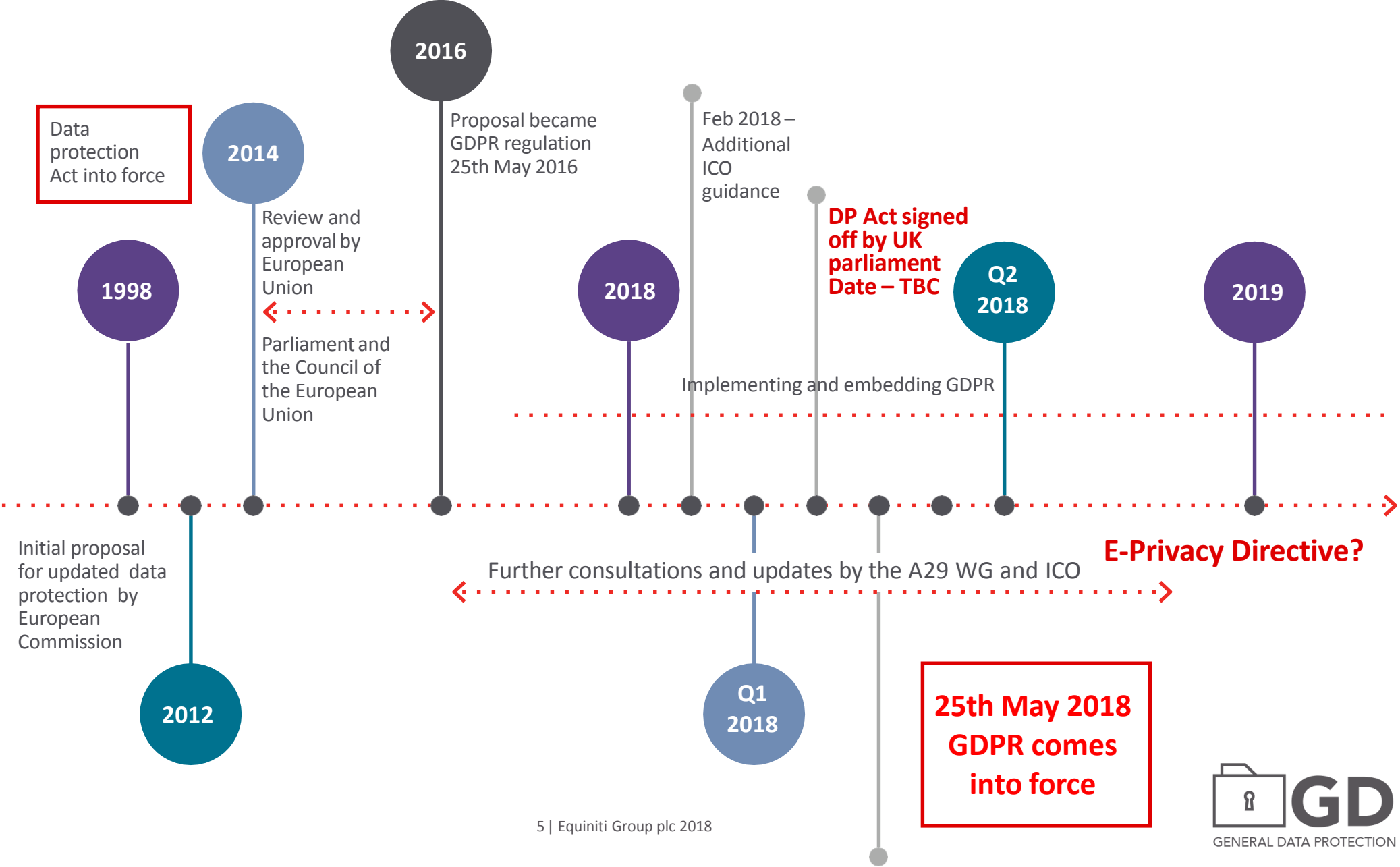
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What is it
seeking to
achieve?

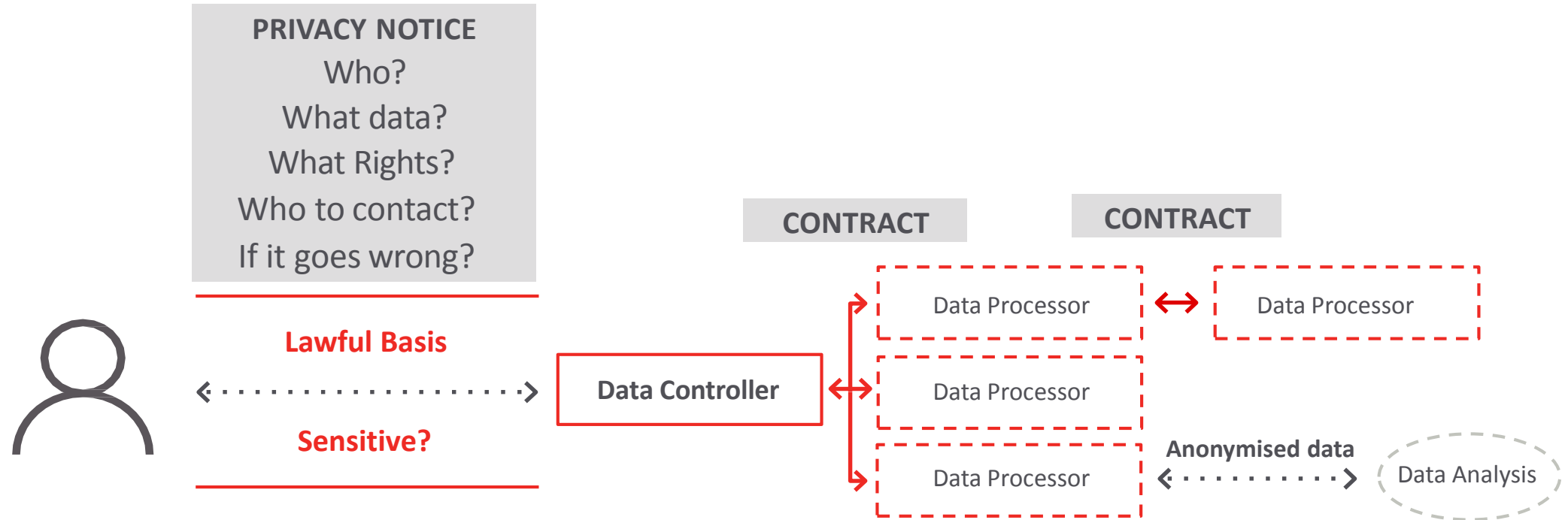
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New aspects
of data
protection

Data Protection Timeline



What is GDPR Seeking to Achieve?



RIGHTS OF THE DATA SUBJECT

1. Information
2. Require rectification
3. Erasure (to be forgotten)
4. Object to processing
5. Restrict processing
6. Data portability

LAWFUL BASIS FOR PROCESSING

1. Legal requirement
2. Contract
3. Legitimate interest
4. Consent
5. Vital interests

- Data protection by design and default
 - Data Protection Impact Assessments
 - Legitimate interest assessments
- Security
 - Appropriate and proportional
 - Encryption
- Data Protection Officers
 - Independent
- Managing events
 - Breach notifications (72 hours)
 - Regulatory powers (including sanctions)
- Regulatory engagement
 - ICO – proportional and balanced
 - EU DPB – A new focus born from A29WG



Awareness

Ensure decision makers and key people in your organisation are aware that the law is changing to the GDPR.



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01



Impact on Boardroom Products

Share
Registration

Employee
Share Plans

Awareness

Ensure decision makers and key people in your organisation are aware that the law is changing to the GDPR.

01



02

Lawful basis for processing personal data

Identify and document the lawful basis for your processing activity.

	Share Registration	CSN/Global Nominee	DRIP/Dealing
Controller	Corporate	Equiniti Financial Services Limited	Equiniti Financial Services Limited
Processor	Equiniti Limited	Equiniti Limited	Equiniti Limited
Lawful basis	Legal obligation	Contract	Contract
Secondary purpose	Legitimate interests	Legal obligation	Legal obligation

	SAYE (Sharesave)	SIP
Controller	Corporate Savings carrier	Corporate Equiniti Share Plan Trustees Limited
Processor	Equiniti Limited	Equiniti Limited
Lawful basis	Eligibility data: Legitimate interests Once joined: Contract	Eligibility data: Legitimate interests Once joined: Contract
Secondary purpose	Legal obligation	Legal obligation

Route to Compliance

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Route to Compliance

Awareness

Ensure decision makers and key people in your organisation are aware that the law is changing to the GDPR.

Information you hold

Document what public data you hold, where it came from and who you share it with.

01



02



03



04

Lawful basis for processing personal data

Identify and document the lawful basis for your processing activity.

Communicating privacy information

Required to review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.

	Share Registration	CSN/Global Nominee	DRIP/Dealing
Controller	Corporate	EFSL	EFSL
Processor	Equiniti Ltd	Equiniti Ltd	Equiniti Ltd
Lawful basis	Legal obligation	Contract	Contract
Secondary purpose	Legal obligation Legitimate interests	Legal obligation Legitimate interest	Legal obligation
Privacy Notice	Corporate Welcome letter/ On line	EFSL On line Privacy Notice	EFSL On line Privacy Notice

	SAYE	SIP
Controller	Corporate Savings carrier	Corporate ESPTL
Processor	Equiniti Limited	Equiniti Limited
Lawful basis	Eligibility data: Legitimate interests Once joined: Contract	Eligibility data: Legitimate interests Once joined: Contract
Secondary purpose	Legal obligation	Legal obligation
Privacy Notice	Corporate Savings carrier Generic template Tailored at launch plan stage	Corporate ESPTL Generic template Tailored at launch plan stage

Route to Compliance

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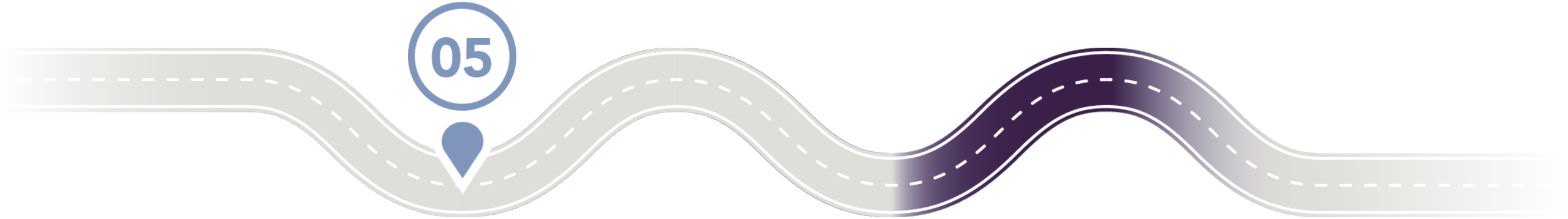
Review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.

Route to Compliance

Individual's rights

Check your procedures to ensure they cover all the rights individuals have.

05



Rights (to request)	Impact on products
to be informed	Privacy notices
to rectification	Investors and employees are already afforded this right
to restrict processing	Usually when consent is provided, could be following expiry of contract and statutory retention period
to data portability	More applicable to data driven services e.g. Amazon
to object	For processing based upon legitimate interests or consent, e.g. marketing
to erasure/to be forgotten	Only applicable when contracts end

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Subject access requests

Update your procedures and plan how you will handle requests within the new timescales.

Route to Compliance

Individual's rights

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05



06



Subject access requests

Update your procedures and plan how you will handle requests within the new timescales.

Route to Compliance

Individual's rights

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Consent

Record and manage consent and whether you need to make any changes.



Subject access requests

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Subject access requests

Update your procedures and plan how you will handle requests within the new timescales.

Children & sensitive data

Consider data processing activity in relation to sensitive data.

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Subject access requests

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Equiniti's Approach to Data Protection

Legal Framework

Governance and Policies

Processes and Controls

Data Life Cycle

Assurance

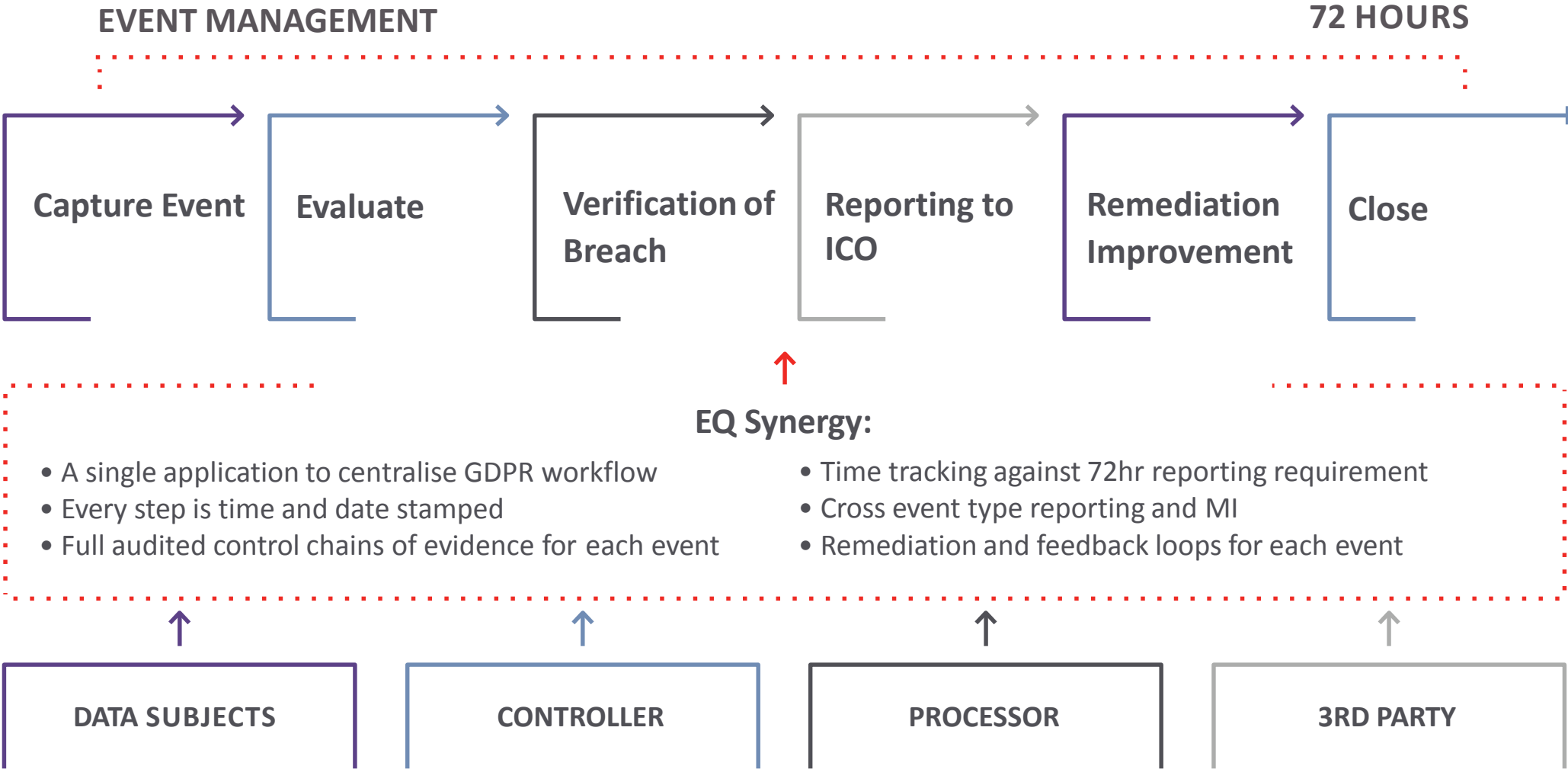
Data Protection Leaders and Champions

Backbone Processes

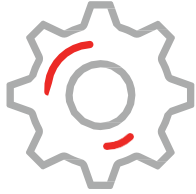
DPIA

DSR

EVENT



Working Together



We will send you a questionnaire to help think about the important contractual and relationship areas to focus on under GDPR



We will discuss the GDPR impact on the products and services Equiniti provides your Company



We will share our proposed Data Protection clauses as an addendum to our existing contractual arrangements



- Your Relationship Manager will be happy to discuss your questions
- If helpful, we can provide a more detailed overview of EQ Synergy

Q&A AND NETWORKING