

## OP 46 General Data Protection Regulation (GDPR) General Statement

### 1.0 Introduction

As of 25<sup>th</sup> May 2018, the General Data Protection Regulation (GDPR) will apply. This Data Protection Regulation is designed to set out rules around personal data, what it is used for, how it is handled, and the governance and responsibilities of the various parties involved.

GDPR requires that Data Controllers and Processors can demonstrate their own compliance with the principles and maintain these principles going forward.

### 2.0 Fourteen IP's Internal Policy and Approach

Fourteen IP have been involved in industry specific GDPR training and have bolstered existing data privacy practises inline with the GDPR regulation.

Our internal GDPR Program will be addressing (but not limited to) into the following areas:

- Fourteen IP staff training and awareness
- Supplier Management
- Data Mapping
- Data Retention
- Cyber Security
- Our direct client privacy

Fourteen IP has designated Data Privacy/GDPR resource at senior management level to oversee our own governance, practise and ongoing compliance.

### 3.0 Systems Functionality Alongside GDPR and Data Privacy For Our Customers.

Fourteen IP provide Estate and Venue Operators with the opportunity to offer Guest Wifi through either on-premises solutions or centralised cloud solutions. Given that the solutions allow the Venue to choose how to present the service and collect data from their venue Guests and Visitors (Data Subjects), there are a number of key requirements that the Venue Operator (the Data Controller), needs to consider prior to the enforcement date:

- Ensure there is clear, identified legal basis for the collection and processing of each data field.
- Where consent is the basis for collection, ensure that a version-controlled, Privacy Notice and Terms and Conditions of Use have been presented to the Data Subject.
- Clear, obvious and explicit consent for each use of data must be given by the Data Subject (no "pre-ticked" consent boxes, or double-negative phrasing).
- If the use of the data changes, then this needs to be reflected in an amended Privacy Notice and Terms and Conditions of Use, and acknowledgement and consent should be reaffirmed.
- The Data Subject must be given the opportunity to remove that consent as easily as it was given, and to have their details updated and amended on request.
- The Data Subject should be provided with a mechanism to receive their data in a "common, transportable machine-readable" format.

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- Whilst storing and processing Personal Data, the risk of a breach needs to be minimised, through technical and organisational measures, including access control, encryption and intrusion prevention.
- The Data Subject has the right to “be forgotten”, so mechanisms need to exist to allow the deletion or anonymisation of personal data.
- Data should be kept only as long as necessary for the purposes defined in the Privacy Notice and should be securely deleted after that period.
- Where the storage and transport of personal data extends beyond the European Union members, adequate measure will have been established to ensure the confidentiality, integrity and availability of the Data Subjects personal data.
- Fourteen IP also have an upgrade path for customers who have legacy hardware in operation such as the HSMX gateway. Details of this program can be provided on request.

### 4.0 Fourteen IP's Customers Going Forward

Additional questions or requirements can be added as per our customer's (Data Controller's) requests for WIFI platform functionality. Fourteen IP recommend that our customers undertake a review of the listed considerations. Specifically, when acknowledging the responsibilities as a Data Controller, it is important to ensure that there is a clear definition of responsibility for both the Venue Operator, and Fourteen IP, when acting as a Data Processor on their behalf. Fourteen IP's cloud WIFI offering is customised to the Data Controller requirements both at time of design and is subject to review upon change. The flexibility of Fourteen IP's WIFI offering with both on premise and cloud specific solutions permits the operator of the property to meet required GDPR regulation.

All stored data for specific user connections can be exported to machine readable format upon reasonable request.

### 5.0 Platform Functionality to Support GDPR & Data Privacy Principles, Terms & Conditions of Use & Privacy Policies

Each distinct venue operator can present their end users and guests with customised terms and conditions of use and privacy notices to ensure that these meet the individual requirements of each venue, and the regionalised requirements for data retention and cross-border data transport.

### 6.0 Multi-Purpose Consent & Marketing Opt-In.

Additional Questions can be added to ensure that transparent and explicit consent can be given for multiple specific purposes (e.g. marketing, support, statistical analysis, 3rd party distribution)

Consent questions can be added on a per-venue, per sub-location basis to provide a differentiation of purpose within separate areas of a venue (e.g. where data captured within a public area will be used for different purposes for those in conference or accommodation areas)

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### 6.0 Fourteen IP's Commitment Going Forward

Fourteen IP is committed to ensuring internal adherence to the GDPR principles from the DPO equivalent level and through into the company structure.

Fourteen IP continues to adhere to industry accreditation and standards to demonstrate its own commitment to regulation and general good practise.

Our accreditations include;

<b>Cyber Essentials Plus</b>	A government backed, industry supported foundation for cyber security hygiene. Our commitment to protecting ourselves against cyber threats.
<b>PCI DSS Version 3.2 (Payment Card Industry Security Standard)</b>	Our commitment to Payment Industry Card (PCI) compliance.
<b>ISO 9001:2015 Quality Management Systems</b>	Our commitment to maintaining an effective Quality Management System that ensures our products and services consistently meet customer requirements and that quality is consistently improved.
<b>Investors In People</b>	Our commitment to leading, supporting and managing people well for sustainable business performance and results.