

SMS Highway statement re GDPR and personal data – May 2018

Protecting personal data

From May 2018 the General Data Protection Regulation (GDPR) will apply to all mobile subscribers' data we hold.

We take our responsibility for the management of mobile subscribers' data seriously and have reviewed all systems and interconnects to ensure that where we store such data, it is held only for legitimate reasons, and is carefully looked after.

Over recent months, we have been preparing for the upcoming introduction of GDPR by undertaking the following steps

- The appointment of a Data Protection Officer
- Training to ensure our staff and management team understand the scope and impact of the GDPR
- A review of all technical, operational and security processes in context
- Restricting log files and metadata storage periods to a minimum
- Entering in to Data protection agreements with suppliers and customers

Where appropriate we will be introducing further changes to processes and procedures to ensure we fully comply with GDPR.

Data storage and processing

We store service usage data, such as SMS metadata, for billing purposes and also for network management and diagnostic purposes. This data contains individual phone numbers but is not processed by us in a way that personally identifies a subscriber. We may analyse this data in an anonymised or aggregated way to identify ways to improve our network or our services, but this does not allow individual records to be identified. We do not process this data for any other purposes.

Any data that we store is held securely within the EU and is processed only for the purpose for which it is collected. We follow the principle of Privacy by Design.

Customers' Rights

Customers and subscribers have clear rights under GDPR which we are fully prepared for:

- The right to be informed about the personal data that is being held and processed
- The right of access to personal data via a Subject Access Request
- The right to rectification of personal data if inaccurate, incomplete, or out of date
- The right to erasure of data where there is no lawful reason for its continued processing
- The right to restrict processing of data where information is inaccurate or there is an objection to the lawfulness of the processing

- The right to portability of personal data to reuse elsewhere
- The right to object if no legitimate reason exists for the processing of data
- The right to check or challenge automated decision making and profiling

Please refer to the GDPR regulation or ico.org.uk for full details of these items and the conditions under which it may be appropriate to contact us or make an access request

Personal data and Subject access requests

Customers can exercise these rights for themselves or their subscribers by making a request in writing to our Data Protection Officer (details below)

Data security and data breaches

We take all aspects of information security seriously, We store all data carefully and apply access controls around all our systems. Should we have a data breach or be made aware of such in our supply chain we will notify this to the ICO within the prescribed timescales of the GDPR.

Data protection officer

If you require further information regarding data protection, please contact our Data Protection Officer at dataprotection@smshighway.com

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SMS Highway Limited

April 2018