At Greenfish, we are all data custodians...

Before going into the GDPR principles, let's remind ourselves that each of us has a responsibility to be conscious and attentive whenever we see, collect, use, share, store, or dispose personal data.

Why does this matter?
Data Custodianship at Greenfish is key to:
— Fostering transparency and privacy within the company
— Maintaining trustful relationships with our clients, partners, candidates, and external suppliers
— Protecting the integrity of our company assets
— Securing our employees' personal information
— Developing better Risk Management

Some definitions...

Processing / Personal data manipulation
Example: collection, erasing, recording, storage, disclosure by transmission, dissemination, destruction, organisation, retrieval,... (Cloud, etc.)

Personal data / Any data relating to an identified or identifiable natural person (living person that can be identified, directly or indirectly)
Example: name, identification number, location data, etc.

Controller / The natural or legal person, public authority, agency or other entity which, alone or jointly with others, determines the purposes and means of the processing of personal data

Processor / A natural or legal person, public authority, agency or other entity which processes personal data on behalf of the controller
The GDPR is a new data protection law directly applicable as of the 25th of May 2018 in the European Union. This one replaces the current EU Data Privacy Directive of 24th October 1995 which was transposed in our Belgian Privacy Act of 8th December 1992.

This Regulation concerns the processing of personal data by Greenfish and its processors. Thanks to the GDPR, the Data Protection Authority shall be able to investigate and impose strict penalties for non-compliance.

What are the main features of the GDPR?

- The data subjects are given more transparency, control, rights and guarantees over the collection, storage, use or sharing of personal data by companies.
- It gives more responsibility to those in charge of the data: Controllers and Processors.
- It has a global impact.

What are the Guiding Principles?

- Transparency & Fairness
- Accuracy
- Data Minimization
- Integrity & Confidentiality
- Accountability
- Purpose Limitation
- Storage Limitation

Negative consequences in case of non-compliance:

- Scrutiny from authorities
- Company reputation
- 4% of global turnover
**How do we put all this in practice?**

**Do I process personal data?**

- Yes

**I must comply with Greenfish’s data privacy principles**

**I make sure that:**

- My processing is legal
- I keep the processing proportionate (minimization)
- I make sure processors with whom I work provide sufficient guarantees to implement appropriate technical and organisational measures
- I inform data subjects about guarantees, their rights, the grounds of processing, etc.
- I keep data accurate and secure
- I do not retain data longer than necessary
- I apply privacy protections whenever I allow access to (or share) data outside the EU

**Which type of data do we have at Greenfish?**

**Greenfish data subjects**

- Employees - Contractors - Partners
- Subcontractors - Candidates - Trainees - Guest Speakers

**Greenfish data categories**

**Non sensitive**

- Personal identification information
- Wage
- National registration number
- Evaluation
- Professional experience details
- Household composition
- Work or residence permit
- Pictures etc.

**Sensitive**

- Health related data (doctor’s certificates)
WHAT ARE THE RIGHTS OF THE DATA SUBJECTS?

- Right to rectify
- Right to erase and to be forgotten
- Right to withdraw his/her consent
- Right to data portability
- Right to object
- Right to access
- Right to be informed

GDPR PROCESSES

1. MAINTAIN RECORD OF PROCESSING ACTIVITIES
2. ASSESS RISKS VIA THE DATA PROTECTION IMPACT ASSESSMENT FOR HIGH RISK DATA PROCESSING ACTIVITIES
3. DEMONSTRATE COMPLIANCE (DOCUMENT ABOUT WHAT WE DO TO PROTECT DATA)
4. REPORT A DATA BREACH
What to do in case of cross border data transfer outside the EU?

I transfer data to third parties in the following countries:
- Switzerland
- Canada
- Andorra
- Argentina
- USA
- Israël
- etc...

These countries have received an adequacy decision from the EU Commission:
- Switzerland
- Canada
- Andorra
- Argentina
- USA
- Israël
- etc...

No additional safeguard is needed.

These countries have not received an adequacy decision from the EU Commission:
- USA
- Israël

Additional safeguard is needed.

Data breach (unauthorised disclosure, hacking, human error, stolen laptop)

Is there a risk to the rights and freedoms of natural persons?

If yes, Greenfish notifies within 72 hours of becoming aware of the breach:
- The data subjects
- The data protection authority

What do I need to do in case of a breach of security?
DO YOU NEED HELP OR EXTRA INFORMATION?

— Contact GDPR: contactgdpr@greenfish.eu

— Greenfish Website: https://www.greenfish.eu