

Duplex Cleaning Machines (UK) Ltd. Unit 27 Joseph Wilson Ind. Est, Whitstable, Kent CT5 3PS.

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Duplex Cleaning Machines (UK) GDPR Statement

Duplex Cleaning Machines (UK) Ltd has deemed itself **Low risk.** Where the risk to data subjects is minimal, a controller may be exempt from the requirement to notify authorities of a data breach and a foreign controller may be relieved from the requirement to appoint a representative in the EU.

Although the GDPR is silent on how organizations should assess and quantify risk, certain trends emerge from the sections where risk does appear that will quide organizations in implementing a risk based approach.

Article 25 exempts controllers from this obligation if the processing is occasional, does not include the large-scale processing of "special categories of data," and is "unlikely to result in a risk for the rights and freedoms of individuals, taking into account the nature, context, scope and purposes of processing." Special categories of data are sensitive data that reveal racial or ethnic origin, political or religious beliefs, as well as genetic, biometric and health data.

Duplex Cleaning Machines (UK) Ltd does **not store any high risk data**, which reveal racial or ethnic origin, political opinions, religion or philosophical beliefs, trade-union membership, and the processing of genetic data or data concerning health or sex life or criminal convictions and offences or related security measures; where personal aspects are evaluated, in particular analysing or prediction of aspects concerning performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, in order to create or use personal profiles; where personal data of vulnerable individuals, in particular of children, are processed; where processing involves a large amount of personal data and affects a large number of data subjects.

Recital 60a EU GDPR identifies other activities that also pose a risk – although perhaps a lower risk – to data subjects. These are processing activities "where data subjects might be deprived of their rights and freedoms or from exercising control over their personal data; where personal data are processed which reveal racial or ethnic origin, political opinions, religion or philosophical beliefs, trade-union membership, and the processing of genetic data or data concerning health or sex life or criminal convictions and offences or related security measures; where personal aspects are evaluated, in particular analysing or prediction of aspects concerning performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, in order to create or use personal profiles; where personal data of vulnerable individuals, in particular of children, are processed; where processing involves a large



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amount of personal data and affects a large number of data subjects." Again Duplex Cleaning Machines (UK) Ltd does not store any of this data.

Duplex Cleaning Machines (UK) Ltd does not participate in systematic and extensive automated profiling, large-scale processing of special categories of data, large-scale, systematic monitoring of a publicly accessible data or other activities that are "likely to result in a high risk for the rights and freedoms of individuals.

Article 34 requires the controller to consult the relevant supervisory authority before conducting the activity. The controller will be exempt from this requirement, however, if it takes measures to mitigate the risk. If the supervisory authority finds that the risk is unjustified, such as "where the controller has insufficiently identified or mitigated the risk," it is empowered to block the processing activity.

Duplex Cleaning Machines (UK) Ltd have mitigated the risk of a data breach by not storing any high risk personal data and a very small amount of low level personal data, I.E the occasional personal mobile phone number or email, the vast majority of data on our system is business data including business emails and phone numbers, all of these are deemed "low risk"

Duplex Cleaning Machines (UK) Ltd take cyber security and data protection very seriously and we have put steps in place within our organisation to ensure we maintain secure and compliant systems. If you have any questions regarding Duplex Cleaning Machines (UK) Ltd position on GDPR compliance and cyber security, please do not hesitate to contact me directly.

Duplex Cleaning Machines (UK) Ltd does not share any data with other companies or individuals.

If you would like us to remove data we may hold on you please let us know at info@duplex-cleaning.com

Yours sincerely,

Mr Kevin Scott

Managing Director
Signed for Duplex Cleaning Machines

Date 18/05/2018