



Spend Anywhere Gift Card

GDPR Statement

The new General Data Protection Regulation (GDPR), significantly expands the data privacy and protection regime within the European Union (EU). The Universal Gift Card Company Limited (“UGC” / “the Company”) alongside its suppliers, must comply with these rules where applicable.

UGC places high importance on information security and we have engaged a programme to address the requirements of GDPR and the use of data, specifically personal data. This involves working with our suppliers and partner organisations to ensure we can meet these obligations.

The key elements of our programme include:

- **GDPR Gap Analysis** – the Company has taken an agile approach in achieving the GDPR expectations. We continue to review all required policies and update to GDPR standard and enhance our systems and processes to the evolving landscape with personal data.
- **Data Impact Assessments** – the Company is conducting a Data Protection Impact Assessment (DPIA) across the business, which includes the preparation of a data asset register and identification of associated third party processors. As outlined under GDPR Articles 35 and 36, the DPIAs s to identify the relevant data components for ensuring adherence to the GDPR Principles. The DPIA will describe the nature, scope, context, lawful basis and purposes of the processing; assesses necessity, proportionality and compliance measures; identify and assesses risks to individuals; and identify any additional measure to mitigate those risks.
- **Policy Enhancement** – the Company has updated policies to GDPR standard and has created new policies where required. This includes refreshing our Privacy Policies, Supplier and Third-Party agreements, with a specific GDPR focus. The Company is also adopting a new approach to Data Subject Access Requests for recording requests and sharing requested personal data.
- **Training and Culture** – we use online training and assessment on GDPR data handling procedures and requirements for staff. Staff are also informed of policies and procedures specific to their roles.
- **Third-party relationships** – we have reviewed all third-party relationships that are in scope for compliance with GDPR Article 28, including all contractual agreements. We are working with these third parties to update agreements where needed, within the appropriate relationship terms; controllers, processors, suppliers and contractors.
- **Technology** – the Company continually reviews data and information security protection controls to maintain their efficiency and effectiveness, as outlined under Articles 25 and 32 of GDPR.
- **Website Data Collection, Consent, and Privacy** – the Company websites include a Privacy Policy and obligations to implement compliant disclosures and transparency notices when receiving personal information from data subjects.

- Client Agreements (Business-to-Business) – the Company continues to respond to all Client Agreements and addendums that address the GDPR requirements. Also, in order to meet the requirements of GDPR Article 28(3), the Company on request will send to all its clients and customers a notification of all appointed sub-processors acting on its behalf, in order to meet the obligation to clients and data subjects.
- Under PECR - we might contact our clients and customers by email with marketing / design news, offers and updates. If customers do not find our marketing communications of use or interest, they can easily choose to unsubscribe from our HTML emails at any time. If they require access, or wish to update the data stored by UGC they are able to request this directly from the website.

The internet isn't always an inherently safe environment, but we will always work to ensure that all reasonable technical and organisational measures are in place to protect customer personal data against accidental or unlawful loss, alteration, unauthorised use, disclosure or access

If there is a breach of the data we hold, which risks customer rights or freedoms, we commit to reporting to the ICO and our partners and customers within 72 hours of the breach.

We seek to undertake regular data and process audits and any changes we make to our privacy policy in the future will be posted on our website and, where appropriate, notified to clients, customers and partners by e-mail.