



GPDR Policy Statement 2019

KiWi Power was founded due to the need for a more sustainable method of balancing the supply and demand of energy. KiWi works in collaboration with Transmission System Operators (TSOs), such as National, to achieve this. KiWi has been a key player in the market since 2009 and provides Demand Side Response (DSR) and Energy Storage solutions in UK and Internationally. DSR and Energy Storage are methods of reducing electricity consumption at times of peak demand. These programmes help TSOs reduce the need to use outdated, expensive and polluting, fossil fuel “peaking” power stations.

KiWi is committed to maintaining a high standard of information security, privacy and transparency. KiWi places a high priority on protecting and managing data in accordance with ISO 27001, GDPR and DPA.

KiWi undertakes to:

- Process lawfully, fairly and in a transparent manner personal data’ - meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (electronic and hardcopy)
- Only gather data for specified, explicit and legitimate purposes associated with the work it carries out and the business it runs and will not carry out further processing
- Only gather and process data relevant and limited to the business
- Ensure that the data it retains is accurate and, where applicable, kept up to date
- Only retain data for as long as is necessary to allow KiWi to operate
- Ensure the data it retains is kept secure and protected against unauthorised, unlawful processing and against accidental loss, destruction or damage

KiWi has reviewed the following and identified:

- The information that it is collecting, processing and retaining
- Why the information is being collected and how it will be used?
- What will be the effect of the information being held on the individuals concerned?
- Is the intended use of the information likely to cause individuals to object or complain?

The focus regarding GDPR, which is overseen by an internal cross-functional team, includes the following:

- Building on existing security and business continuity management systems
- Maintaining certifications including ISO 9001 and ISO 27001
- Analysis of the data held including assessment of the risk to the data
- Personnel data applicable to employees and contract staff



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Compliance and Data Sharing

KiWi is compliant with applicable GDPR and Data Protection Act (DPA) regulations as a Data Controller. KiWi's Data Controller will inform, advise and monitor compliance with GDPR and KiWi confirms that it does not collect, hold or process and data appertaining to children. Data will only be shared with organisations KiWi has framework agreements in place for the purposes of the contract with the client.

Management Systems

KiWi has a robust ISO 9001 and OHSAS 18001 based Management System, which is in the process of being expanded to include the requirements of ISO 27001. KiWi is currently certified to international standards by ISOQAR (a UKAS accredited company):

- ISO9001:2015 – Quality Management
- OHSAS18001:2007 – Occupational Health and Safety

Scope

The scope of the certified Occupational Health and Safety Management System covers 'The provision of demand side response, through the use of innovative energy technology'.

This policy is supported by a documented and certified Quality and Occupational Health and Safety Management System, which details how KiWi effectively manages the significant risks associated with the processes carried out. This policy will be reviewed annually and updated as necessary to ensure continued compliance with KiWi requirements, strategy and current legislation.

Availability

Copies of all KiWi policies and the procedures that support them are available on Dropbox to all members of staff. All KiWi policies are available to view on KiWi's website and in the main office break out area. All other documents will be made available to interested third parties upon request.

Signed: 

Gavin Sallery (Chief Technology Officer)

Date: 25/01/2019

Next review: January 2020