

Data Protection Policy 2018 (GDPR)

GSI Corporation Ltd (GSI) recognises the importance of complying with data protection legislation, including the existing Data Protection Act 1998 and the General Data Protection Regulation (EU) 2016/679, effective from 25 May 2018 ("Data Protection Legislation").

Data Protection Legislation regulates the capture, storage and use of information about individuals, known as "personal data".

GSI operates to comply fully with the Data Protection Legislation.

The principles under the General Data Protection Regulations require that personal data, including that of our employees and third parties, is:

- 1. Processed lawfully, fairly and in a transparent manner;
- 2. Collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- 4. Accurate and, where necessary, kept up to date;
- 5. Kept for no longer than is necessary for the purposes for which the personal data is processed; and
- 6. Processed in a manner that ensures appropriate security of the personal data.

To achieve compliance, GSI will ensure that:

- There are individuals in the organisation who can provide advice and assistance on issues arising under the Data Protection Legislation;
- Everyone managing and handling personal data understands that they are responsible for following good data protection practice;
- Everyone managing and handling personal data is appropriately trained;
- Queries about handling personal data are promptly dealt with;
- Procedures for handling personal data are clearly described; and
- A regular review is made of the way personal data is managed.

The responsibility for compliance primarily rests with GSI; however, every employee has an individual responsibility to ensure compliance and can be held legally accountable.

The policy covers all GSI's activities.

Neil A Fraser (Chief Executive Officer)

This policy will be reviewed annually to ensure that it reflects current legislation and regulations.

Signed:

GSI Corporation Ltd Head Office: Kaimes Railway Yard Long Dalmahoy Road, Kirknewton Edinburgh EH27 8EE

Date: 15 April 2018