



Revised MRS Fair Data Principles (September 2018)

| GDPR Principles and concepts | Current Fair Data Principle | Revised Fair Data Principle |
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| Lawfulness, Fairness and Transparency | Principle 1: We will ensure that all personal data is collected with customers' consent. | <i>Principle 1: We will ensure that all personal data is processed in line with the expectations of the individuals of our use of their personal data.</i> |
| Purpose Limitation Transparency Data minimisation | Principle 2: We will not use personal data for any purpose other than that for which consent was given, respecting customers' wishes about the use of their data. | <i>Principle 2: We will only use data for specified purposes and be open with individuals about the use of their data, respecting individuals' wishes about the use of their data.</i> |
| Data minimisation Accuracy Data retention Data subject rights | Principle 3: We will make sure that customers have access to their personal data that we hold, and that we tell them how we use it. | <i>Principle 3: We will make sure that individuals have easy access to their personal data that we hold, and that we tell them how we use it and how they can exercise their rights over it.</i> |
| Integrity and confidentiality | Principle 4: We will protect personal data and keep it secure and confidential. | <i>Principle 4: We will protect personal data and keep it secure and confidential.</i> |
| Integrity and confidentiality | Principle 5: We will ensure staff understand that personal data is just that – personal – and ensure that it is treated with respect. | <i>Principle 5: We will ensure staff and all persons involved with our organisation understand that personal data is just that – personal – and ensure that it is treated ethically and with respect.</i> |
| Lawfulness, Fairness, Transparency | Principle 6: We will ensure that the vulnerable and under-age are properly protected by the processes we use for data collection. | <i>Principle 6: We will ensure that the vulnerable and under-age are properly protected by the processes we use for data collection, use and management.</i> |



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| Ethical safeguards and best practice | Principle 7: We will manage our data supply chain to the same ethical standards we expect from other suppliers. | <i>Principle 7: We will manage our data supply chain to the same ethical standards we expect from other suppliers.</i> |
| Ethical safeguards and best practice | Principle 8: We will ensure that ethical best practice in personal data is integral to our procurement process. | <i>Principle 8: We will ensure that ethical best practice in personal data is integral to our procurement process.</i> |
| Accountability | Principle 9: We will ensure that all staff who have access to personal data are properly trained in its use. | <i>Principle 9: We will ensure that all staff and persons involved with our organisation who have access to personal data are properly trained in its use.</i> |
| Privacy by design and default Data subject rights | | <i>New Principle 10 We will ensure that privacy risks are always properly considered and addressed in all our processes, both automated and non-automated, for the collection and use of personal data.</i> |
| Accountability | | <i>New Principle 11 We will ensure that we can adequately resource and can demonstrate our responsibility for compliance with data protection requirements.</i> |
| Accountability | Principle 10: We will not use personal data if there is uncertainty as to whether the Fair Data Principles have been applied. | <i>Principle 12: We will not use personal data if there is uncertainty as to whether the Fair Data Principles have been applied.</i> |