



GDPR Implementation Status

We are committed to protecting the personal information of our customers, employees, and partners.

What are we doing to comply?

Ref	Requirement	GDPR Article	Actions
1	Implement a data breach incident response plan	33	We have a robust GDPR-compliant incident response plan that is part of our corporate policy. The response plan is subject to regular review to ensure our processes continue to be effective in the management and security of our customer's personal information as well as our own.
2	Privacy Impact Assessment	35	Privacy Impact Assessment (PIAs) have been a part of corporate policy and address systems, service providers, products, services and technologies that involve personal information.
3	Revise consent form with new requirements	13	Our internal processes were updated to meet the GDPR requirements.
4	Update contract terms with service providers	28	We are identified our data processors. Our company uses GDPR-compliant contract clauses in each new service provider agreement, and we amend existing service provider agreements.
5	Update contract terms with customers	26	We are identified our data controllers. Our company uses GDPR-compliant contract clauses in each new agreement, and we amend existing agreements
6	Document data security review	32	Our IT teams continue to maintain high levels of security and ensure that security is appropriately documented.
7	Operationalize right to object to processing	21	We have a plan to operationalize the right to object to processing across the business.
8	Privacy by Design	25	Privacy by Design is already embedded in our corporate culture as can be evidenced by our broad use of PIAs in reviewing, updating and creating internal processes, products, services, and technologies.
9	Data portability	20	We have a plan to operationalize the right to object to processing across the business.
10	Appoint a Privacy Professional	37	Privacy Professionals have been appointed to operate at a European / global level to reflect our business structure.
11	Data Inventory	30	We implemented a Personal Information Data Inventory process that is updated annually.
12	Operationalize objection to direct marketing	21	Our IT teams provide solutions to permit individuals to opt out of direct marketing. We comply with current regulatory requirements



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on the use of data for direct marketing.