



Partner GDPR Certification Statement

The following details CIAT's GDPR compliance on certain topics:

Legal basis for sharing Personal data with us: Our customers share personal data with us so we can provide the services our customers ordered in their service contracts with us.

Third-party sharing: As disclosed in our contract with you and our privacy notice, we will not share customer personal data other than to certain select third parties who help us provide the service to our customers.

Who is the data controller? At all times, our customer is the data controller for the customer's end-users. The customer's end-user data belongs to our customers, and to their customers.

In addition, we are the data controller for our employee personal data.

Who is the data processor? We are the data processor for our customers' end-users.

Data quality – accurate, relevant: We have current and appropriate GDPR-compliant policies to uphold the quality and accuracy of the personal data we hold.

Data security: We prioritize the security of the data we hold and maintain GDPR-compliant security policies. We have a data breach response plan to deal with any potential data breaches. Our employees authorized to process personal data are committed to confidentiality and the protection of data privacy in accordance with our codes of conduct.

Data retention: We securely retain customer personal data in accordance with applicable law and our stringent policies. Unless required otherwise under applicable law or regulation, we will delete a customer's personal data upon written request.

Individual's rights – procedure for subject access requests, inquiries and complaints: We respect the rights of individuals concerning their Personal data, and we uphold the GDPR. We have implemented a process to deal with subject access requests. Please forward any questions regarding subject access requests or an individual's right to their personal data to privacy.compliance.ccs@utc.com