## Vbrick General Data Protection Regulation (GDPR) Policy

## What is GDPR?

On May 25, 2018, the EU General Data Protection Regulation (GDPR) became law in EU Member States and governs the processing of EU personal data.

The GDPR replaces the existing patchwork of national data protection laws in EU Member States and brings a degree of consistency to the data protection landscape in Europe. GDPR includes the well-recognized privacy principles of transparency, fairness, and accountability. The GDPR also adopted a risk-based approach that balances individual rights with participation in the global digital economy.

## VBrick Commitment to GDPR as a data processor

**Security:** VBrick data protection and security processes have been developed based on NIST 800-53 revision 4 and are regularly subjected to third-party audits and testing for security, confidentiality, availability, processing integrity, and privacy controls. VBrick allows customers to manage and control their users' access to Workday application via role-based access.

**Cross-border data flows:** The GDPR continues to allow the flow of personal data across country borders, and includes provisions ensuring existing data transfer mechanisms remain valid going forward. VBrick customers may leverage VBrick's EU Privacy Shield Certification or sign model contractual clauses with VBrick to legitimize their cross-border data flows.

**Privacy impact assessments (PIAs):** The GDPR requires PIAs for many types of data processing. VBrick's privacy team regularly and methodically conducts PIAs on features, technology, third party on boarding, and operations related to our service. While we do not anticipate any significant changes to our already-thorough existing methods, our privacy team continues to monitor the GDPR to help ensure our PIAs fulfill any new requirements.

**Security breaches:** The GDPR introduces new notification rules for security breaches that result in a variety of harms to individuals. VBrick has a formal internal incident response plan in place that aligns with these notification requirements.

## Helping our customers as data controllers

In addition to VBrick's own compliance obligations under the GDPR as a processor of customers' personal data, VBrick also assists our customers in meeting their obligations as data controllers under the GDPR in a variety of ways. Here are some highlights.

**Data purging:** To support customers' compliance with the <u>Right to be Forgotten</u>, VBrick offers a wide range of functionality and services to delete and purge data.

**Access rights:** VBrick offers role based features to help customers comply with access rights under the GDPR.

**Activity logging:** To help customers protect personal data against security threats, VBrick can log activity for each account. That includes successful logins and failed attempts as well as changes or additions to data by our customers and their end users. This will also help customers demonstrate access monitoring and oversight, displaying a high level of compliance assurance.