

GDPR Readiness Statement – May Update

Absolute Results is committed to our customers' success, including compliance with the [General Data Protection Regulation \(GDPR\)](#).

The GDPR will take effect across the EU on 25 May 2018. As a global organization, Absolute Results complies with all applicable data privacy laws and is fully committed to protecting the personal data of its clients and employees. Our processes are GDPR compliant today and we will have the new GDPR Privacy Statements and Binding Corporate Rules (“**BCR**’s) governing the High Standards for Transfer and Processing of Personal Data across the Absolute Results Group of Companies posted on our web sites prior to 25 May 2018 effectivity date.

The GDPR is a new comprehensive data protection law that strengthens the protection of personal data due to rapid technological developments, increased globalization and international flows of personal data. It updates and replaces the data protection laws currently in place with a single set of rules, directly enforceable in each EU member state.

Overall the GDPR provides a central point of enforcement and authority for cross-border data protection issues. The GDPR regulates the “processing” of data for EU individuals, which includes collection, storage, transfer and use. All organizations that process personal data of EU individuals is within the scope of the law, regardless of whether the organization has a physical presence in the EU.

The GDPR does not require EU personal data to stay in the EU, nor does it place any new restrictions on transfers of personal data outside the EU. Absolute Results ensures that we have good data handling, protection, security policy and processes in place to facilitate this, additionally all storage is secure and our private cloud suppliers have GDPR procedures in place.

What you should do to be GDPR ready

Similar to the privacy and data protection regulations, compliance with the GDPR requires a partnership between Absolute Results and our clients in their use of our services. Absolute Results is closely analyzing the requirements of the GDPR and currently reviewing our data and privacy policy and processes to ensure our readiness to comply with the GDPR in the delivery of our service to our clients. We are also dedicated to [helping our clients comply](#) with the GDPR.

If you are getting started with GDPR compliance in your organization, here's a few items you will need to review:

- Establish a data privacy team to oversee GDPR activities and raise awareness
- Review your current security and privacy policies and processes
- Review contracts with third parties and customers to meet the requirements of the GDPR
- Identify the Personally Identifiable Information (PII)/Personal data that is being collected
- Understand how this information is being processed, stored, retained and deleted
- Assess how you share and deliver data to third parties for the supply of services
- Establish procedures to respond to data subjects when they exercise their rights
- Create processes for data breach notification activities



Absolute Results Data Processing

We collect, manage and process customer data to establish and operate your account with us. We obtain most of the information directly from you with your consent. The decision to provide us with your customers personal information always rests with you. The type of information that we collect will depend on the type of product or service that you have requested. We may use your supplied data within our processes to help us understand client habits and preferences and to help us understand current and future needs. We also use this information to help us forecast future business requirements. We may, however, be limited in our ability to provide you with certain products and services, if you decline to provide us with information essential to fulfill your request.

We will only collect personal information in a fair and lawful manner. The personal information collected is used exclusively for the purposes described above and for no other purpose. We do not rent or sell personal information to any third parties.

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse and any other unlawful form of processing of the Personal Data in our possession.

While we process data supplied to us in England and Canada, we also use Amazon Web Services (AWS) for cloud storage, [AWS is GDPR compliant](#) as well. As such we may transfer and store Personal Data outside of the EU. Absolute Results complies with applicable legal requirements providing adequate protection for the transfer and storage of personal information outside of the EU.

Our Commitment to GDPR Readiness

At Absolute Results, we know that our clients are concerned about the confidentiality and security of their customers personal information. Absolute Results, as a Data Processor, is committed to safeguarding the confidentiality and protecting the security of all personal information entrusted to us. We are working to be ready for the new GDPR and to ensure our policies, procedures and security measures are adequately complied with by our employees and representatives throughout our organization.

Absolute Results processes Personal Data securely

As a general rule and unless otherwise requested by the client, Absolute Results applies the same level of security to Personal Data it processes as a Data Processor and Personal Data it processes as a Data Controller.

Absolute Results applies and maintains appropriate technical, physical, and organizational measures to protect Personal Data, and follows industry practices and standards in adopting procedures and implementing systems designed to prevent unauthorized access to Personal Data and to avoid its accidental loss, damage or destruction.



Absolute Results Data Privacy Governance

Absolute Results has a Data Security and Protection Program (“**DSPP**”) in place to protect its information and those of its clients and to counter security risks. The data security and protection program objectives establish a coordinated and mandatory security level for all entities of the Absolute Results Group. Data protection, data privacy and confidentiality are at the core of the data security and protection program.

Absolute Results works with sub-processors in a responsible manner

Please be assured, Absolute Results shall only use Absolute Results Processors who have signed the Data Protection Addendum (“**DPA**”) and the Data Privacy Policy (including those located outside the EEA) and are bound by an agreement and a statement of work. When using External Data Processors, Absolute Results shall enter into appropriate agreements that require that the Personal Data is stored and processed in accordance with EU Applicable Law and as per the Data Controller’s instructions.

Accountability

Primary responsibility for data protection lies with the company and the company has put in place a data privacy governance structure with a designated Data Protection Officer (“**DPO**”) to oversee the privacy compliance program and Data Subject Right Requests.

Our Data Protection Officer is: Mr. Jason Tso, he may be contacted by email at: Privacy@absoluteresults.com

For additional detail, please refer to our current [Privacy Policy](#) . The new GDPR Privacy Statement will be posted to meet the requirement dates in the next few weeks.

Please feel free to contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices by email at privacy@absoluteresults.com

Last update: May 2018