

GDPR Compliance Statement

We refer to the agreement(s) between Vaioni Group Limited and our affiliates (us or we) and your company (you) (the Agreement).

As you may be aware the EU General Data Protection Regulation (GDPR) will become enforceable on 25th May 2018, replacing the Data Protection Act 1998.

Protecting the privacy and personal data of our customers is of paramount importance to us.

We have a robust GDPR programme to ensure that we comply with GDPR as from 25th May 2018 and any other relevant data protection laws in the UK (Data Protection Legislation).

We continuously monitor our processing activities to ensure that we comply with applicable Data Protection Legislation throughout the duration of our Agreement.

Depending on the services and the nature of the processing activities, we may have responsibilities as a Data Controller or as a Data Processor, as these terms are defined under the Data Protection Legislation.

Where we act as Data Controller, we will comply with our legal obligations under applicable Data Protection Legislation.

Where we act as Data Processor on your behalf, we will:

Lawful Processing

- Ensure that all data processing carried out by us on your behalf is lawful and undertaken only in accordance with your instructions;
- Use reasonable endeavours to notify you where, in our opinion, an instruction received from you infringes, or is likely to infringe Data Protection Legislation.

Sub-Processors

- Not engage any sub-processor to process your personal data except where such sub-processing has been authorised by you;
- Where you have consented to sub-processing, ensure that our sub-processor is bound to terms and conditions no less onerous than those set out in our Agreement;
- Where we act as sub-processor, we will act in accordance with the instructions of the relevant processor and controller.

Confidentiality Undertaking

- Ensure that our employees authorised to handle and/or access systems that handle your personal data are bound by confidentiality undertakings.

Security Measures

- Implement appropriate technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access;
- Ensure that access to systems containing personal data is controlled on a need-to-know basis (this ensures that employees have only the level of access they require to perform their job function, including where relevant the processing of personal data).

Data Breaches

- We take reasonable steps to prevent any data breaches. If we become aware of a personal data breach, we shall notify you without undue delay. Please note that any obligation to report a breach to the Information Commission's Office (ICO) remains your responsibility as Data Controller under Data Protection Legislation.

Return or Deletion of Personal data

- Unless there is a specific legal requirement for us to keep the information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.
- Make available to you all information reasonably necessary to demonstrate compliance with your obligations under Data Protection Legislation.

Data Protection Officer

- Our Data Protection Officer (DPO), responsible for overseeing our data protection strategy and implementation to comply with GDPR requirements is available to clarify any queries you may have on the following e-mail address: dpo@vaioni.com.

Vaioni Group Limited
June 2018