

Advertising Production Resources GDPR Compliance Statement

Effective as of May 25, 2018

Statement of Compliance

APR Consulting Co. and APR Europe Limited are in compliance with applicable data protection regulations and are committed to GDPR compliance across its relevant services.

Introduction

The **EU General Data Protection Regulation (“GDPR”)** went into effect across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

APR Consulting Co. and APR Europe Limited (*collectively, ‘APR’ or ‘we’ or ‘us’ or ‘our’*) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had an effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How We Prepared for the GDPR

APR already had a consistent level of data protection and security across our organization prior to the implementation of GDPR. However, we did implement our own plans and procedures in order to be fully compliant with the GDPR by the 25th May 2018. *Our GDPR compliance implementation includes:*

- **Information Audit** - carried out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- **Policies & Procedures** – revised existing and implementing new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including: -
 - **Data Protection** – our privacy policy and incident response procedures for data protection have been revised to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand

and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on the rights of individuals.

- **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures have been disseminated to all key employees, making them aware of the reporting lines and steps to follow.
- **International Data Transfers & Third-Party Disclosures** – where APR stores or transfers personal information outside the EU, we have procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include standard data protection clauses between the EU and the United States.
- **Subject Access Request (SAR)** – we have revised our privacy policy to include SAR procedures to accommodate the revised 30-day timeframe for providing the requested information. Our new procedures detail how to verify the data subject, what steps to take for processing an access request and what exemptions apply.
- **Legal Basis for Processing** - we have reviewed and are continuing to review our processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- **Privacy Notice/Policy** – we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- **Processor Agreements** – where we use any third-party to process personal information on our behalf (*i.e. Payroll, Recruitment, Service Providers, etc*), we have drafted compliant Data Processing Agreements and due diligence procedures for ensuring that they (*as well as we*), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide the ability for any individual's right to access any personal information that APR processes about them and to request information about:

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use

- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

Information Security & Technical and Organisational Measures

APR takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including:

- TLS (Transport Layer Security) for all data in transit, including APR email;
- Data at rest on the APR servers is encrypted with AES (Advanced Encryption Standard);
- Robust Firewall security at the perimeter of the APR physical offices;
- Restricted access to employee files on APR servers;
- Ongoing revisions to APR password complexity requirements (WIP); and
- Monitoring of all incoming and outgoing APR email for suspicious content.

GDPR Roles and Employees

APR has designated a data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team are responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures. APR understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR.

If you have any questions about our preparation for the GDPR, please contact our Information Security Coordinator at (303)759-2509 or aprco@aprco.com.