

Imagineer Technology Group GDPR Readiness

Agenda

1. GDPR Overview

2. Imagineer's approach

3. How Imagineer's products can help you

Background

[What is GDPR?]

The General Data Protection Regulation (GDPR) governs the handling of personal data of all individuals within the EU (citizens, residents & visitors) as well as those EU citizens living abroad.

This new regulation will be enforced starting on **May 25, 2018**.

**GDPR
applies if
you have:**



STANDARDS

COMPLIANCE



REGULATIONS



POLICIES



TRANSPARENCY



REQUIREMENTS

EU-based organization or presence

EU-based vendors/service providers/suppliers

Clients or prospects in the EU

Marketing to EU citizens or in the EU

Employees, investors or clients with EU citizenship

How Imagineer is Tackling GDPR

Adherence Strategy

[Our Approach]



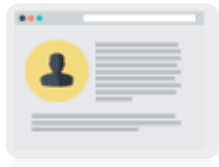
Key Roles Defined

[Data Subject]

Definition	Data Subject Rights
Identified natural person in the EU	<ul style="list-style-type: none">○ To be informed○ Data access○ Data rectification○ Data portability○ To object (eg. opt-out)○ Be forgotten (erasure)

Data Types Defined

[Data sets covered in GDPR]



Identity, i.e. email



Web (IP, cookie)



Health & Genetic



Financial



Cultural



Mental



Biometric



Social & political

Key Roles Defined

[Data Processor vs. Data Controller]

Data Controller	Data Processor
<ul style="list-style-type: none"><li data-bbox="377 805 1212 922">○ Collects personal data for a defined purpose and means<li data-bbox="377 996 1212 1176">○ Must enable data requests as well as capture and manage consent from data subjects	<ul style="list-style-type: none"><li data-bbox="1319 805 2155 922">○ Processes the data on behalf of the controller

Key Roles Defined

[Role Diagram]

DATA SUBJECTS (EU PERSONS)



YOU ARE

DATA COLLECTOR /
DATA COORDINATOR



Imagineer IS DATA
PROCESSOR



IMAGINEER CLIENTS



Imagineer IS DATA
COORDINATOR/PROCESSOR



OTHER SERVICES ARE
DATA PROCESSORS:

AWS, AZURE, ETC.

Background

[Lawful basis for processing]

Data processing is considered lawfully necessary for:

1. The execution of a contract in which the data subject is a party
2. Adherence to legal obligations
3. Protection of the data subject's vital interests
4. A task carried out in the public interest
5. Legitimate interests pursued by the controller
6. A specific reason in which the data subject gives consent

Background

[Consent has a new standard]

Consent is required if the data collection cannot be justified by legitimate business need:

1. Must be explicit for the data collection and the purpose of use
2. Data collectors must be able to capture consent given
3. Data subjects have the right to withdraw consent

Background

[Right to be forgotten]

1. Applies in only certain circumstances
2. Does not include non-editable or offline documents
3. Focus on GDPR principles
4. Promptly respond to requests

Adherence Strategy

[Our Approach]



Infrastructure & Security

[Privacy Policy]

1. Identify the Data Controller
2. Provide the contact information for the Data Controller and DPO
3. Whether you use personal data for automated decisions
4. Inform users their rights under GDPR
5. Whether personal data is required for your services
6. If data is outside of EU, provide details on data security compliance, such as Privacy Shield
7. Legal basis for processing data

MOST IMPORTANTLY: It needs to be clear and concise

Infrastructure & Security

[Privacy Shield Certification]

In order to help satisfy the GDPR requirements, we have begun the process for Privacy Shield certification.

The EU-U.S. & Swiss-U.S. Privacy Shield Frameworks were designed to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States.

Infrastructure & Security

[Our Data Processing Addendum]

The addendum will be a standard form to be executed, and is designed to comply with Article 28 to assist our clients with their compliance with the GDPR.

The addendum will cover:

- The subject matter, duration, nature, and purpose of the data processing
- The controller's (our clients') documented instructions governing the processing
- Controller's (our Clients') rights and obligations, and Processors (Imagineer's) commitments to assist with Controller's compliance with the regulations
- Processor's (Imagineer's) obligations to implement technical and organizational security measures

Adherence Strategy

[Our Approach]



Product Enhancements

1. Requests to be forgotten: Ability to completely delete someone from your database (Synap)
2. Greater control over stored email (Synap)
3. New login/signup flow (Synap)
4. Google Analytics obfuscation (WebVision)
5. More prominent disclosure options (WebVision)

How to leverage our products to help comply

Product Features

[Opt-in Consent]

WebVision:

Disclaimers – content specific disclaimers & capture disclaimer acceptance

Clienteer:

Ability to turn off email tracking for a specific group of contacts

Product Features

[Opt-out Management]

Clienteer + WebVision:

1. Leverage Clienteer's link tracking functionality to capture when an individual clicks on an unsubscribe webpage. Users then can review the tracking statistics to successfully remove those who have withdrawn their consent.
2. For clients using our Auto-Notification option, their users can opt out of auto notifications directly on their web site user profile page

Product Features

[Data Access]

Entire Product Suite:

1. Inventory personal data & report on it

Clienteer + WebVision:

1. A user can view and edit their online profile information
2. Pull the updated contact information back into Clienteer

The final word...

Questions: privacy@itgny.com

Disclaimer

[We're not lawyers]

The information presented here is of a general nature and is not intended to address the specific circumstances of any individual or entity.

Your legal counsel is your best friend as it relates to all things GDPR. Seek their counsel. 😊