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THE GENERAL DATA PROTECTION REGULATION AT WORLDAPP*

What is the GDPR?

The General Data Protection Regulation (GDPR) is a substantial legal act which replaces the EU Data Protection Directive 95/46/EC. It harmonizes the data protection legislation within the EU, protects the rights of EU data subjects, and safeguards their personal data.

To whom does the GDPR apply?

The GDPR applies to organizations processing the personal data of identifiable natural persons within the EU (data subjects) regardless of the organization's location.

The definition of personal data processing is comprehensive and includes collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of personal data.

When will the GDPR come into effect?

The GDPR came into effect on the 25th of May 2018.

Can personal data be transferred outside the EU under the GDPR?

Yes. The restrictions that the Data Protection Directive 95/46/EC imposed on personal data transfers were not changed by the GDPR. Personal data can be transferred from the EU to other countries when either the adequacy decision has been adopted by the European Commission in regards to those countries or the appropriate mechanisms which ensure the adequate level of data protection is enforced.

WorldAPP uses Standard Contractual Clauses adopted by the European Commission to safeguard any personal data transfers. Due to the CJEU Schrems II ruling the Standard Contractual Clauses may be used only in addition to the technical and organizational measures that make access to the transferred data impossible or ineffective. That is why, we have implemented additional technical and organizational measures that allow us to adequately protect the data during transfers.

We are aware that the Privacy Shield Program was invalidated by the CJEU, but we still participate in it to show our commitment to the highly valued principles of the data protection stated there.

Our contract templates contain personal data protection clauses to reflect the requirements of the EU data protection legislation and guarantee compliance with it.

What makes WorldAPP GDPR compliant?

WorldAPP has implemented various processes to ensure compliance with the GDPR, in particular:



1. We incorporated the data protection clauses into our contract templates to ensure compliance with the requirements of the GDPR;
2. We are ISO 27001 certified;
3. We implemented additional technical and organizational measures for the data transfers due to CJEU Schrems II ruling;
4. We refreshed our Privacy Policy to establish the necessary changes implemented by the GDPR;
5. We developed policies and procedures to address data subjects' requests in strict compliance with the GDPR;
6. We created policies and procedures to adequately address and limit, to the maximum extent possible, public authorities' ability to request or access the personal data;
7. It is our policy not to create any programming or technology that would allow third parties, including authorities, to access our systems or personal data stored on those systems;
8. We keep data processing records required by the GDPR;
9. We appointed a Data Protection Officer to assure well-defined data protection control;
10. We appointed DPO consulting in France as an official representative of WorldAPP in the EU;
11. We conduct GDPR compliance training for the persons who are authorized to process personal data within the company;
12. We have a well-established mechanism of regular policies review to guarantee compliance with the data protection legislation;
13. The processes within the company allow us to restore data availability and access in a timely manner in case of the unlikely technical accident;
14. We provide our customers with safe and legitimate means for personal data transfer;
15. We are implementing additional technical and administrative measures which will secure personal data in accordance with the GDPR.

How does our application help you comply?

Preservation of clients' data is one of WorldAPP's most important objectives. We monitor data protection legislation regularly to guarantee data safety and compliance with the data security standards.

Using our application, you can guarantee the fulfillment of individuals' rights under the GDPR:

Right to be informed

To comply with the key transparency requirement of the GDPR, the right of individuals to be informed about the collection and use of personal data, you can provide them with specific information about intended processing activities within the surveys and forms you create. For instance, when building your surveys and



forms via our platform, you can insert links to your Privacy Policy in the relevant fields to inform the data subjects about their personal data collected by your company at the time you collect it from them.

Right of access and data portability

We will not directly communicate with individuals regarding the personal data you collect about them via the platform and will address any requests for access we receive to you. Nevertheless, the elaborated features within our platform provide you with the ability to guarantee this GDPR right to individuals. You may access and download data at any time. You can easily extract personal data from our system and provide it in a readable and structured format, as available in the platform, to the individual.

Right to rectification

If an individual addresses you with a requirement to rectify his/her personal data, this may be fulfilled by updating personal data contained in the platform, having incomplete data completed, etc.

Right to be forgotten

Our platform allows you to comply with the right to erasure provided to data subjects by the GDPR. The features we have let you delete data in bulk or choose data which needs to be deleted from the platform's production database.

Right to restrict processing

Right to restrict personal data processing may be fulfilled by the ability to store, but not use personal data of individuals within the platform.

Right to Object

Our system lets you guarantee the individual's right to object to the processing of their personal data by providing you with the ability to stop processing the individual's personal data whenever required.

We also implement the necessary technical and organizational measures to ensure that personal data is protected from unlawful destruction, loss, alteration, or unauthorized disclosure. We offer encryption in transit and (for branded accounts) at rest to ensure the most important GDPR principle: security of personal data.

WorldAPP maintains application and other logs to let you monitor activity within your account.

You can also restrict staff access to personal data via the application or limit the scope of their capabilities, guaranteeing the protection of data from unauthorized access.



To reduce risks and achieve control of the data processing as required under the GDPR, you can manage and control user access via the three types of administrative accounts offered within the application:

1. Enterprise Administrator account (available in self-hosted environment): within this account, our customers can create and administer the rights of all users and accounts in the application; Enterprise administrators cannot give access to their account to support team, only Multi-user, Multi-access and sub-accounts can do that;
2. Multi-user account: account administrator can create sub-users and control over the amount of credits available to sub-users, suspending sub-users' accounts;
3. Multi-access account: account administrators can create sub-accounts and control which folders can be accessed, and which platform features are available.

WorldAPP's team will diligently work to advance the platform's features and improve the services we provide to help you protect data subjects' personal data at the highest level and conform to the data protection legislation.

