

Alvaria's Undertakings for Achieving Compliance with EU's General Data Protection Regulation - III

On May 25, 2018, the EU's General Data Protection Regulation (GDPR) came into effect, replacing existing EU data protection laws based on the 1995 EU Data Protection Directive. The GDPR strengthens privacy rights for EU individuals and extends the scope of responsibilities for businesses processing personal data of EU individuals.

This document updates Alvaria's Customer Advisories of July 2017 and March 2018, outlining in greater detail Alvaria's steps towards compliance with the new legislation.

Under the direction of Alvaria's global GDPR project team, Alvaria has closely analyzed the requirements of the GDPR and made the necessary modifications to its products and services, contracts, and documentation to support GDPR its own compliance and the compliance for our customers.

Specific steps taken since July 2017 include:

- Alvaria finalized a full information audit and data mapping exercise covering all personal information on data subjects processed by Alvaria in its role as controller and processor. This effort included all processing activities undertaken by Alvaria by itself and on behalf of customers through Alvaria's products and services. The level of detail includes, but is not limited to, the purposes of processing, data subjects, categories of personal data, lawful bases for processing, location of data and retention periods.
- Based on the results of the information audit described above, Alvaria implemented additional privacy by design and default principles into our products and services (and any upgrades) to ensure features and functionality allow Alvaria and its customers to comply with GDPR's regulatory requirements -- especially those relating to data subject requests for information, access, rectification, erasure or portability of personal data.
- Alvaria supplemented existing documentation to demonstrate compliance with GDPR principles, including technical and organizational security measures, documentation on processing activities and privacy-by-design and default measures. In addition, policies and procedures for each Alvaria department throughout our organization were reviewed and updated. Furthermore, Alvaria provided initial training for each department handling personal data, including development and cloud operations, and will require global employee training specific for GDPR prior to May 2018.
- Alvaria developed an ongoing process to perform data protection impact assessments (DPIA) for its own business purposes to identify lawful methods for GDPR-compliant data processing. Alvaria will also assist customers in conducting DPIAs as further specified in Alvaria's standard contracts.
- Alvaria updated its existing data security breach processes to detect, report and investigate a data breach and help customers meet the notification and communication requirements under GDPR.
- As part of Alvaria's global business organization, Alvaria does transfer data to the U.S. and other countries outside the European Economic Area (EEA), providing adequate safeguards such as standard contractual clauses adopted by the European Commission per its decision of 5 February 2010 under Directive 1995/46/EC. Should the standard contractual clauses cease to exist or are no longer considered to be a lawful method of transferring personal data outside of the EEA, Alvaria will -- at its own cost -- comply with any alternative

mechanism to enable and safeguard the transfer of personal data in a compliant manner.

- Alvaria ensured and will continue to ensure that any vendors or third parties who process personal data as a (subsequent) processor to Alvaria enter into a written agreement imposing upon such processors the same data protection obligations as are imposed on Alvaria. This includes sufficient guarantees to implement appropriate technical and organizational security measures to meet GDPR requirements. Further, Alvaria offers a GDPR-compliant mechanism to remove, replace or appoint suitable and reliable processors, as applicable.

Thank you for your continued trust in Alvaria.

In case of further queries, please reach out to Alvaria at GDPR@alvaria.com.

Corporate and Americas Headquarters

5 Technology Park Drive, Suite 9
Westford, MA 01886
+(1) 978 250 7900 office
+(1) 978 244 7410 fax

Europe & Africa Headquarters

The Record Store, 15 Pressing Lane
Hayes UB3 1EP, United Kingdom
+(44) 20 8018 8000 office
+(44) 20 8561 4776 fax

Asia Pacific & Middle East Headquarters

3 Temasek Avenue, Centennial Tower, #21-00
Singapore 039190
+(65) 6590 0391 office
+(65) 6324 1003 fax

About Alvaria

Alvaria was founded through the merger of Aspect Software and Noble Systems, technology leaders in Customer Experience (CX) and Workforce Engagement solutions. Our name is derived from Latin for “hives” – nature’s perfect form for millions of years – bringing you solutions that are scalable, resilient and secure, with efficiency, speed and pinpoint accuracy. ALVARIA™. Reshaping Customer Experience™.