

# GDPR Statement

## Background to GDPR

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), adopted on April 27, 2016, is a regulation intended to strengthen and unify data protection for individuals within the European Union (EU). It also addresses the transfer of personal data outside of the EU. The primary objectives of GDPR are to enhance EU residents' control of their personal data and to simplify the regulatory environment for international business by imposing uniform data protection requirements on all EU members. GDPR replaces the data protection directive (officially Directive 95/46/EC) from 1995 and is effective from May 25, 2018.

## CyberOne's Commitment

CyberOne is committed to compliance with GDPR. Just like existing privacy laws, including the preceding data protection directive, compliance with GDPR requires a partnership between CyberOne and our customers in their use of our services and products. CyberOne has reviewed the requirements of GDPR, and is working to make enhancements to our services, products, documentation, and contracts to support our own compliance with GDPR.

CyberOne has updated its Data Protection Policy (DPP) and supporting processes to align with GDPR requirements. This updated DPP will contain revised or additional contractual provisions where appropriate in order to assist our customers in their compliance with GDPR.

As a managed services provider, data privacy and security is at the core of CyberOne's business and something CyberOne takes very seriously. CyberOne remains committed to protecting personal data in compliance with the highest standards of privacy and security. Below is a high-level summary of CyberOne's compliance with many of the key areas of GDPR.

## Data Protection

- As the data processor, CyberOne will only process personal data on behalf of the data controller and on written authorisation from the data controller (i.e. through a contract or order).
- CyberOne expects that its customers, as the data controllers, will notify their employees and users (i.e. the data subjects) of the processing carried out by CyberOne and will obtain their consent for CyberOne to do so.
- CyberOne ensures the confidentiality and availability of the personal data that it processes, and that appropriate technical and organisational measures are taken to protect such personal data.
- For the majority of CyberOne's services and products, personal data is never stored by or accessible by CyberOne.
- Customers have the option to obfuscate their user IDs from ever being seen by CyberOne Operations and Support teams or their own administrators.
- Logs are never stored in clear text.

- CyberOne only allows access to personal data by personnel who are authorised administrators with appropriate privileges.
- CyberOne does not process or store any personal data that is not needed to perform the contracted services on behalf of the data controller.
- The personal data that CyberOne processes on behalf of the data controller will be accurate, complete, and kept up-to-date as much as technically possible.
- Personal data will not be disclosed, made available, or otherwise used for purposes other than to perform the contracted services on behalf of the data controller, except as required by law.
- If CyberOne uses any sub-processors, it will first obtain the data controller's consent to do so and will ensure that all of CyberOne's obligations under GDPR and its contract with the data controller are also flowed down to any such sub-processors.
- All transfers of personal data outside of the European Economic Area (EEA) will only be done for the purposes of providing the contracted services to the data controller and will be subject to EU-US and Swiss-US Privacy Shield principles.
- CyberOne retains Logs in its provided applications for rolling periods of at least six months, after which the Logs are securely purged.
- At contract termination or expiration, the Logs will be purged pursuant to the six-month retention cycle, or as earlier requested in writing by the data controller.
- CyberOne will make available to the data controller all information reasonably necessary for the data controller to demonstrate its compliance with GDPR.
- CyberOne will be accountable and responsible to ensure its own compliance under GDPR.

## Security Safeguards

- CyberOne protects personal data through reasonable security safeguards against such risks as loss or unauthorised access, destruction, use, modification, or disclosure.
- CyberOne has certified to the ISO 27001 information security framework in order to maintain consistent and robust security controls and procedures for all customers.
- CyberOne performs robust security measures on its systems such as antivirus, firewalls, scheduled vulnerability scanning, penetration testing and security code peer reviews.
- All CyberOne personnel who are authorised to process personal data have committed themselves (through employment and confidentiality agreements) to the confidentiality and security of personal data.
- In addition to adhering to ISO 27001 principles, the top tier global data centres that CyberOne uses take security just as seriously as CyberOne – through, among other protections, sophisticated entry control systems, dual power feeds with backup generators, and video surveillance.

- CyberOne is able to ensure ongoing confidentiality, integrity, availability and resilience of its processing systems and services, in addition to restoring real-time availability and access to personal data in a timely manner in the event of a physical or technical incident.
- CyberOne has an internal process for regularly testing, assessing, and evaluating the effectiveness of the technical and organisational measures for ensuring the security of the processing of personal data.
- CyberOne will notify the data controller without undue delay after becoming aware of a personal data breach and will assist the data controller in reporting to supervisory authorities and affected data subjects any personal data breaches.



[www.cyberone.security](http://www.cyberone.security)  
+44 (0) 3452 757575  
[enquiries@cyberone.security](mailto:enquiries@cyberone.security)