

Aquent's EU General Data Protection Readiness Notice

The European Union General Data Protection Regulation (EU GDPR) is the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. The EU GDPR comes into force on May 25, 2018.

Aquent LLC, a US based company, is committed to high standards of information security, data privacy, and transparency, and to managing data in accordance with legislation and regulation, including but not limited to EU GDPR. Aquent attests that it will comply with applicable EU GDPR regulations as a data processor for staffing.

At Aquent, we understand the importance of your personal data, and we take steps to secure and protect your data whenever it is stored in our infrastructure. To meet the new privacy standard set by EU GDPR, Aquent has assembled an internal cross-functional team dedicated to implementing required processes and protocols. Some of our ongoing EU GDPR initiatives include:

- Data Protection Governance
- Policies and Procedures
- Cross Border Transfer Methods
- Data Protection Risk
- Third-Party Vendor Management
- Respond to Requests from Individuals
- Monitor for New Operational Practices
- Data Privacy Breach Management Program
- Training and Awareness Program

Data Protection Governance

A DPO, or Data Protection Officer, is central to EU GDPR and oversees certain data protection responsibilities within a company, as well as, ensuring the company is correctly responding to subject access requests. Aquent will engage a Data Protection Officer before May 25, 2018.

Policies and Procedures

Aquent's policies regarding data ownership and protection are focused on providing you with confidence that your data remains secure, and under your control. We have established a number of measures to ensure that customers and clients data are treated in a manner consistent with privacy principles.

Cross Border Transfer Methods

Aquent's current Privacy Shield certification with the United States Department of Commerce provides a legal basis for cross-border data transfers under both Directive 95/46/EC and the EU GDPR, and is evidence of Aquent's commitment to the Privacy Shield principles of notice, choice, accountability for onward transfers, security, data integrity, purpose limitation, access, recourse, enforcement, and liability. For more information about the Privacy Shield program, please visit www.privacyshield.gov.

Data Protection Risk

Aquent protects your data from inappropriate access or use by unauthorized individuals with robust measures.

Third-Party Vendor Management

Aquent continues to enhance its review of all vendors and third-party contracts to ensure that all of our partners apply the high standards of data protection that we and our customers expect. Further we are updating our third-party vendor contracts to meet the requirements of GDPR in order to permit us to continue to lawfully transfer EU personal data to those third parties and to permit those third parties to continue to receive and process that data.

Respond to Requests from Individuals

An important element to privacy and EU GDPR is the right of a person to control their data: under GDPR a request for data may be reviewed, modified, or even deleted. As the request may impact different business units, Aquent's Subject Access Rights (SARs) Committee is tasked with governing a clear and unified approach to ensure all SARs are responded to in a timely and complete manner.

Monitor for New Operational Practices

Aquent takes a holistic approach to your data and integrates Privacy by Design into our system and product development. Further Aquent conducts data impact assessments to identify and mitigate data protection issues identified during assessments.

Data Privacy Breach Management Program

Aquent's data protection breach management program takes into account the expanded and new rights as detailed in the EU to report personal data incidents to the relevant data protection authority, and in some circumstances, to the affected data subjects.

Training and Awareness Program

All Aquent employees must complete data privacy and security training. Aquent has supplemented existing training modules with EU GDPR-specific content. In addition to these training requirements, Aquent conducts ongoing awareness initiatives on a variety of topics, including data protection, security and privacy.

In summary, Aquent will be complying with the EU GDPR and we are updating and implementing any necessary changes as described above. Should you have any questions regarding Aquent and the EU GDPR please contact privacy@aquent.com and we will respond.