



GDPR Whitepaper

Last updated: December, 2018

In 2016, the European Union (EU) approved a new privacy regulation called the General Data Protection Regulation, more commonly known as the “**GDPR**”, which went into effect as of May 25, 2018.

As a company that has always taken privacy very seriously, the success of our customers in the GDPR era is very important to us. This is why we, NetSpark Ltd. (“**NetSpark**”), have put this document together to provide an overview of what NetSpark has done to get prepared for GDPR.

What is the GDPR? The GDPR is a comprehensive data protection law that updated existing EU laws to strengthen the protection of “personal data” (defined as any information relating to an identified or identifiable natural person, so called “data subjects”) in light of rapid technological developments, the increasingly global nature of business and more complex international flows of personal data. It replaces the current patchwork of national data protection laws with a single set of rules, directly enforceable in each EU member state.

What is NetSpark’s take on the GDPR? We welcome the positive changes the GDPR brings, such as the increased harmonization and the “privacy by design and privacy by default” approach. Our view is that the GDPR is not only an obligation but also an opportunity to build privacy-friendly products while increasing customer trust.

What has NetSpark done in order to comply with the GDPR? This is a high level summary of what we have done so far:

✓ **GDPR Strategy**

- We retained outside counsel to help us understand the GDPR.
- We built an internal taskforce with members from different departments within NetSpark to implement the GDPR compliance plan internally.

✓ **Data Mapping.** We have mapped NetSpark’s data collection practices to assess what actions we are required to take under the GDPR.

✓ **Privacy Policy update.** We have updated our privacy policy governing the processing of personal data of our EU customers, in accordance with the provisions of the GDPR.

✓ **New Features.** We have made a number of modifications to our systems so that it is easier for us to comply with (or assist our customer to comply with) requests related to data subject rights.

✓ **Data Storage.** We store all of our customers personal data in compliance with all applicable data protection law and regulations, using appropriate safeguards to ensure the protection of our customers personal data.

✓ **Security.** NetSpark has taken the following measures to ensure the safety and security of its customer’s information:

- **Database permissions and access:** Database permissions and settings have been set to a high standard, including permissions to access through a specific pre-define IP and a two-step verification identification process for every employee with access to personal data.
 - **Information Security Procedures:** Netspark has issued an internal Information Security Policy indicating how our employees should handle personal data of our customers within the organization. We periodically review and adjust the policy to ensure that our customers personal data stays protected within NetSpark's organization
- ✓ **Data Processing Agreements.** We've entered into Data Processing Agreements in accordance with Article 28 of the GDPR with our third party service providers who process personal data subject to the GDPR for on our behalf.
- ✓ **Data Transfers.**
- **NetSpark's staff.** Our staff sits in Israel, which was declared by the European Commission as a country that offers *adequate level of data protection* (see: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).
 - **Other vendors and partners.** We only share and transfer personal data that is subject to the GDPR with vendors and partners who have announced that will comply with the GDPR and have undertaken to do so.
- ✓ **Ongoing compliance.** We are not approaching GDPR compliance as a one-time exercise. Therefore, we are committed to periodically review our roadmap and ensure ongoing compliance.

Is there any way of demonstrating compliance? Are there GDPR certifications or GDPR “seals”? The GDPR mentions various mechanisms for demonstrating GDPR compliance, such as code of conducts, data protection certification mechanisms and data protection seals and marks. However, none of these tools have are available to the public yet. Once these mechanisms are available, NetSpark will consider obtaining or adhering to one of them.

I have more questions. Who should I contact? If you have any additional questions about the GDPR you are welcome to contact us at: support@netsparkmobile.com.

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