

# ControlUp GDPR Statement

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# **About ControlUp**

ControlUp is transforming the way IT professionals manage systems, troubleshoot issues, and help to deliver a great user experience. More than 1,000 organizations around the world rely on ControlUp to save time, money, and precious human resources to ensure business continuity.

# **ControlUp Compliance with GDPR**

ControlUp is committed to General Data Protection Regulation (GDPR) compliance. Our engineering, product, security and compliance teams have been working diligently to align our procedures, documentation, contracts, and services to support compliance with GDPR guidelines.

## **Processing Customer Data**

As part of its service offering, ControlUp processes personal data contained in customer data, as the terms are defined in the <u>ControlUp EULA</u> and <u>Privacy Policy</u>. In this instance, ControlUp acts as the 'processor' - acting on controller instructions - while the customer is the 'controller' who determines the purposes of the processing.

#### Data Processing Agreement

ControlUp has published a <u>Data Processing Agreement (DPA)</u> that incorporates the appropriate definitions required by the GDPR.

This DPA was created under the supervision of EU privacy experts and is designed to comply with the GDPR and to reflect the specific details of the data processing activities associated with ControlUp's products and services.

All customers using ControlUp services to process personal data that is subject to the GDPR, must implement a DPA with ControlUp to allow both the customer and ControlUp to comply with the GDPR DPA requirements.

#### Subprocessor Information

As required by the GDPR and other privacy regimes, ControlUp provides customers and users with information about affiliates and trusted third-party vendors engaged as <u>sub-processors</u> of ControlUp solutions and services.

#### Data Storage and Cross-Border Data Transfers

Currently, ControlUp stores customer data across three sites:

- AWS US East (N. Virginia)- This site currently stores end users personal data as detailed in our Privacy Policy and DPA.
- AWS Europe (Ireland).
- AWS Europe (Frankfurt) Just for the Scoutbees product.

We are working to offer an additional and dedicated EU data center (Frankfurt, Germany) for customers who want to store their end user personal data locally. This development and migration effort is due to be completed in the early Q3 of 2021.

For more information about AWS data centers: <u>https://aws.amazon.com/compliance/data-center/</u>

ControlUp relies on standard contractual clauses (SCCs) to ensure obligations are met with respect to the transferring of personal data to processors established in third countries.

## Data Privacy Officer

ControlUp has appointed a Security and Compliance Manager who works with key internal and external stakeholders to manage our privacy program and answer questions that our prospects, customers, and partners may have about our ongoing compliance efforts.

### Security

ControlUp is committed to ensuring that the security and privacy of your data is protected. To do so, we have a comprehensive information security program that is guided by a defense in depth philosophy that includes privacy by design and privacy by default practices

ControlUp follows the best international industry standards and we have also developed our own best practices to stay ahead of the increasing number of threats facing all service providers today. ControlUp maintains appropriate technical and organizational measures to secure your data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access, as described in the <u>ControlUp Security</u> <u>White Paper</u>.



