This document outlines Ascribe's compliance to the European General Data Protection Regulation (GDPR[a]) that will take effect at the end of May 2018. This applies to Ascribe software that categorizes and analyzes survey responses with automated and semi-automated processing.

Ascribe's GDPR compliance includes the following two areas:

1. Ascribe Infrastructure is GDPR Compliant

Ascribe Infrastructure is and will remain compliant for the following reasons:

- The entire Ascribe infrastructure is housed in a virtual private cloud at Amazon Web Services (AWS), an organization that has invested heavily in GDRP compliance. All services provided by AWS are GDPR ready[b]. In their whitepaper on GDPR compliance[c] AWS states: We can confirm that all AWS services will comply with the GDPR when it comes into effect in May 2018.
- Data that clients store in Ascribe is stored within the confines of our virtual private cloud and does not leave the GDPR compliant AWS infrastructure except at the client's explicit command.
- Ascribe provides tools to ensure that data transferred from Ascribe at client's command is secure in transit. This includes the use of the https and secure FTP protocols.
  - We recommend that client IT staff consult with Ascribe Support to ensure that they use these secure transfer protocols.
- Aside from transfers of data from Ascribe to clients, Ascribe does not transfer client data outside of its virtual private cloud.
  - The only exception to this is when survey response automated translation is requested, the data are transferred via https to the Google translation API. These data are not persisted by Google.

2. Client Use of Ascribe in a GDPR Compliant Manner

The GDPR applies to the processing of personal data. Personal data is defined by the GDPR in Article 4(1):

> *'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*

Categorization of survey responses does not require processing of personal data.
  - Clients should not load personal data into Ascribe.
  - If clients unintentionally load personal data into Ascribe, our support staff will assist in removing the personal data to the best of their ability.

If you have questions regarding Ascribe's GDPR Compliance, please contact Rick Kieser at rick.kieser@goascribe.com or (513) 241-9112 extension 14.

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[a] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN

[b] https://aws.amazon.com/compliance/gdpr-center/

[c] https://d1.awsstatic.com/whitepapers/compliance/GDPR_Compliance_on_AWS.pdf