

## THE EU GDPR–SONA’S COMPLIANCE EFFORTS

Updated on May 21, 2018

Sona Systems, Ltd. (“Sona”) is committed to compliance with the EU General Data Protection Regulation (“GDPR”) framework and other data protection laws. The purpose of this memo is to provide customers with information about its GDPR compliance efforts.

### DATA PROTECTION OFFICER

- Sona has designated President Justin Fidler as its data protection officer (“DPO”). Because Sona is an Estonian entity, this designation has been registered with the Estonian Data Protection Inspectorate (English-language website [here](#)).
- Mr. Fidler has passed the EU General Data Protection Regulation Foundation (EU GDPR F) exam administered by the International Board for IT Governance Qualifications.

### PRIVACY POLICY

- Sona has updated its Privacy Policy, including by publishing Mr. Fidler’s contact details. The most current version of the Privacy Policy is always available [here](#).

### DATA PROCESSING AGENDA

- Sona’s Data Processing Addendum (“DPA”) is available so that customers (as data controllers) can enter into a DPA with Sona (as data processor) as required by GDPR. For customers, this document is part of Sona’s Access Agreement and Terms of Service, the most current version of which is always available [here](#).
- Sona also maintains DPAs with subprocessors.

### CROSS-BORDER DATA TRANSFERS

- Sona is an EU-based entity with customers worldwide.
- Sona’s software resides on servers in datacenters in the same region as the customer and generally does not leave that region. This is the case where Sona is the data processor:
  - For customers in the EU, their Sona sites reside on servers in the Netherlands, and off-site backups are stored in Germany. The data is not transferred outside the EU.
  - For customers in the US, their Sona sites reside on servers in Virginia, and off-site backups are stored in Texas. The data is not transferred outside the US.
  - For customers in Canada who have opted for hosting in our datacenters in Canada, their Sona sites reside on servers in Quebec, and off-site backups are stored in Ontario. The data is not transferred outside Canada.
- Our internal customer records are maintained on servers in the US for all customers worldwide. This does not contain information about end-users, but rather information about questions the customer’s Sona administrator

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may have asked, as well as billing details, but never credit card numbers. This is the case where Sona is the data controller, and it covered under the US-EU Privacy Shield Framework. View Sona’s Privacy Shield certification [here](#).

### DATA PROTECTION

- Sona has implemented appropriate technical and organizational measures designed to ensure an appropriate level of data security.
- Under certain circumstances, Sona also offers customer the opportunity to implement additional data security measures within the services as part of customer’s role as data controller.

### PERSONAL DATA BREACH

- Sona will notify customers without undue delay once it or any subprocessor becomes aware of a data breach affecting customer’s data and will cooperate to assist customer in meeting its legal obligations with respect to any such breach.
- Sona holds data breach insurance with coverage of \$500,000 (USD) per incident.

If you have any questions, please contact Justin Fidler for further information.