

# DATA PROTECTION & GDPR

1. Data Protection & GDPR; we refer here to the Regulation (EU) 2016/679 which came into force on the 25th May 2018. For an easy to navigate version of the regulation visit <https://gdpr-info.eu/>
2. ASP provides a CMS and website service. (the Services), we act as the Processor, and you are a Controller, in reference to any Personal Data, we shall:
  1. **Follow Controllers Instructions**

Process the Personal Data only on your documented instructions as set out in these terms, including with regard to transfers of Personal Data to a different country or an international organisation; we require any transfer of data to third parties (including but not exclusive to) the sale of a brand (tradeshow, consumer show, conference or exhibition) to be confirmed in writing.
  2. **Comply to the Law**

Unless prohibited by law, notify you if we are required by any law of the European Union or the law of one of the Member States of the European Union to act other than in accordance with your instructions or if, in our opinion, any of your instructions infringes the Regulation or other Union or Member State data protection provisions;
  3. **Use only Quality Sub-Processing Software**

We do not hire sub-contractors; however, we do use third party tools to help us perform our roles. By agreeing to these terms and conditions, we have your general authorisation to obtain other Processors and shall respect the conditions referred to in paragraphs 2 and 4 of EU GDPR Article 28 for any such engagement. We assess all sub-processors software to have the correct levels and data security and with the relevant data storage agreements in place (i.e. In the EEA or with the correct data agreements, within the USA). We shall ensure that the Sub-processor contract (as it relates to the Processing of Personal Data) is on terms which are substantially the same as, and in any case no less onerous than, this data protection clause;
  4. **Treat Data with Respect**

Enact and store all Personal Data as confidential information;
  5. **Take Data Security Seriously**

We take security seriously and will ensure your data is secure as possible, limited by budget and usability constraints. ASP adopts a defence in defence approach with 3 layers of firewalls.
  6. **Follow the Rights of the Data Subject**

We shall aid you in respect of EU GDPR chapter III (Art 12 -23) as far as the CMS can. Further work required may involve a fee if beyond normal requirements.
  7. **Protect Stored Data – Rights & Deletion**

If required, delete or return all the Personal Data to you, when our services in respect of

that data are no longer required, and delete existing copies unless laws require retention of the Personal Data;

8. **Be a compliant processor**

If required, following a written request, make available to you all reasonable information necessary to demonstrate compliance with the obligations laid down in Article 28, and allow for and contribute to audits, including inspections, conducted by your or another auditor mandated by you; and

9. **Take Data Breaches Responsibly**

Notify you without undue delay if we become aware of a Personal Data Breach for which we are responsible. Such Breaches may be reportable to the ICO within 72 hours.

3. Outside of this section regarding Data Protection & GDPR, please ensure you comply with all relevant Data Protection Laws.