

## ProctorU's GDPR Readiness Plan

The European Union has taken a monumental step in protecting the fundamental right to privacy for every EU resident with the General Data Protection Regulation (GDPR) which will be effective from May 25, 2018. Simply put, EU residents will now have greater say over what, how, why, where, and when their personal data is used, processed, or disposed. This rule clarifies how the EU personal data laws apply even beyond the borders of the EU. Any organization that works with EU residents' personal data in any manner, irrespective of location, has obligations to protect the data. ProctorU is well aware of its role in providing the right tools and processes to support its users and customers meet their GDPR mandates.

At ProctorU, we have always honored our users' right to data privacy and protection. We have never relied on advertising as a revenue stream and we have no necessity to collect and process users' personal information beyond what is required for the functioning of our products.

Over the years, we have demonstrated our commitment to data privacy and protection by meeting the industry standards. We already have strong Data Processing Agreements, and we are revising them to meet the requirements of the GDPR. ProctorU participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework with respect to transfer of data to the US. We recognize that the GDPR will help us move towards the highest standards of operations in protecting customer data.

ProctorU is preparing to be GDPR compliant across all of its applications, by the time the regulation comes into effect. As a data processor, we have thoroughly analyzed GDPR requirements and have put in place a dedicated internal team to drive our organization to meet them. Some of our ongoing initiatives are:

**Providing visibility and transparency** - The most important aspect of GDPR is how the collected data is used. As a data processor, ProctorU's key role is to provide our customers (the data controllers) with the access to effectively manage and protect their user data. ProctorU is exploring ways to make optimal product enhancements without compromising on performance so that we can provide better transparency to our customers.

**Enhancing data integrity and security** - Data privacy and data security are interrelated. As our customers tighten their data security measures, ProctorU would like to extend a helping hand. We're streamlining the processes for our cloud applications by implementing IT policies and procedures that provide end-to-end security.

**Portability and transferability of data** - GDPR gives end users the right to either receive all the data provided and processed by the controller or transfer it to another controller depending on technical feasibility. With this new right in mind, ProctorU is working on further enhancing its data exporting capabilities to enable export even at the individual level.

ProctorU can assure you that we are taking the GDPR requirements very seriously and are working cross-functionally with all our partners to ensure that ProctorU's privacy standards are always first class.

Jarrold Morgan,  
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