

General Data Protection Regulation (GDPR)

GDPR Policy

FOUR
BUSINESS
SOLUTIONS



General Data Protection Regulation (GDPR)

Four Business Solutions

Last Updated: May 2019

Four Business Solutions (“Four”) respect your privacy and are committed to maintaining the privacy and confidentiality of the personal information we collect.

General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a new European data protection regulation adopted by the EU Commission. It replaces the EU Data Protection Directive, also known as Directive 95/46/EC. The GDPR became effective on May 25, 2018 and will strengthen security of and regulate personal data in the broadest sense. The GDPR applies to both individuals and businesses and regulates the way in which personal data of citizens in the European Union should be handled.

We would like to provide you with answers to some of the questions that we hear time and time again from our customers. We also want to provide an update on what Four has done to ensure that we will be ready for GDPR and what services we offer to our customers to help them meet their compliance obligations.

FAQs about the upcoming General Data Protection Regulation

When it comes to customer data, is Four a controller or a processor?

Under the GDPR, a “controller” determines why and how personal data is processed. A “processor” processes personal data on behalf of the controller. Four has limited knowledge of the data that each customer processes via the hosting infrastructure (“Customer Data”). Also, Four only processes Customer Data in accordance with the customer’s instructions. Therefore, Four is a processor of Customer Data hosted at Rackspace; the customer is a controller.

Will GDPR change the way Four treats customer data?

Four continues to treat Customer Data with the required level of sensitivity and confidentiality. Four will continue to invest in the security of its customer solutions to ensure it remains compliant with applicable legislation.

With the new GDPR, can an EU customer continue to host personal data outside of the EU/EEA?

Provided certain legal mechanisms are in place, EU customers can host personal data outside of the EU. Personal data may be transferred outside of the EU and the EEA when an adequate level of protection for that data is guaranteed. To help achieve this level of protection your hosted solution which is Privacy Shield certified by Rackspace.

Won't I be in breach of the data protection laws if Four transfers my personal data outside the EU/EEA?

The current laws allow Four to process personal data and therefore support your services from outside the EEA if you have given us your consent, or if data is transferred to a non-EU jurisdiction deemed by the European Commission to offer an adequate level of protection for personal data, or if the transfer is subject to model contracts.

Can you keep my data in the EU only?

4.

Four are able to offer good infrastructure support through our partner Rackspace who operate a 24/7 "follow the sun" support model that leverages support engineers in countries where they operate. This means that although we will not move your personal data into another jurisdiction without your consent, sometimes they will provide environment support from outside the EU.

Will the Data Protection laws/GDPR apply when Britain leaves the EU?

The U.K. legislation on data protection is derived from the EU Directive on data protection. The new Data Protection Act 2018, which is now effective as of May 25, 2018, replaces the Data Protection Act 1998 and incorporates GDPR into UK law. The purpose of the new Act is to ensure that the U.K. and EU data protection regimes are aligned after the U.K. leaves the EU.

Do you have other data centers within the EU where I can store my data?

Yes, Rackspace has other data centre's in other countries, including Germany, to provide our customers additional options for an EU footprint.

Personal Information We Collect

Our Privacy Notice and specific privacy notices describe how we handle the personal information we collect about you. Personal information could include, for example, your name and contact details that you provide when you:

- Purchase services from us
- Apply for a job
- Visit our websites
- Sign up for events

Disclosure of Personal Information

When we need to provide your Personal Information to third parties, we will only share it to the extent reasonably necessary. We may also share your Personal Information as required or permitted by law.

Additional Privacy Rights for Individuals in the European Union

In addition to the rights described elsewhere in this Privacy Notice, you may have additional Personal Information protection rights pursuant to applicable information protection legislation. If you are an individual in the European Union, these may include the right to information portability, the right to withdraw consent for processing, the right to object to or restrict the processing of your Personal Information, and the right to lodge a complaint with the supervisory authority of the EU country in which you reside.

How You Can Contact Us about Privacy

**Chief Privacy Officer
Four Business Solutions Ltd
118 Pall Mall
London SW1Y 5EA**

If you have any questions, comments, or concerns about your privacy or this Privacy Notice, please contact us at privacy@four.co.uk or you may write to us at the above address:

<http://www.four.co.uk/information/legal/policy/GDPR>