



## Smart Wires' Data Privacy Commitment

On May 25, 2018, the European Union (EU) will begin enforcing a new data protection regulation called the [General Data Protection Regulation](#) (GDPR). The GDPR is designed to standardize data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organizations across the region approach data privacy. The GDPR applies to organizations located within the EU in addition to organizations located outside of the EU if they offer goods or services to, or monitor the behavior of, EU natural persons or 'data subjects.' It applies to all companies processing and holding the personal data of data subjects residing in the EU, regardless of the company's location.

Smart Wires is fully committed to achieving compliance with the GDPR by the May 25, 2018 enforcement date. Data privacy is at the core of our business at Smart Wires. We are regularly enhancing and evolving our security platforms, procedures and methods to better protect our users' information and anonymity in the U.S. and globally.

## What steps is Smart Wires taking to comply with GDPR?

We are actively working to address GDPR compliance for all our EU resident users and will apply the same rules for the U.S. in order to comply with upcoming data privacy laws. As we approach the May 25, 2018 enforcement date, Smart Wires has:

- Reviewed EU GDPR Guidelines
- Appointed Data Protection Officers
  - Scott Homes, U.S.
  - Grace McLoughlin, Europe
- Conducted audit of all our systems with European personal info
- Validated all our systems with European personal info are GDPR compliant
- Educated main stakeholders on GDPR
- Updated all opt-in/out website forms
- Communicated email opt in/out policy to all current European subscribers
- Scheduled quarterly data protection review meetings

## What constitutes personal data as part of GDPR?

Any information related to a data subject that can be used to directly or indirectly identify the person, according to the GDPR. It can be anything from a name, a photo, an email address, posts on social networking websites, or medical information.

## What personal data does Smart Wires collect and how is it used?

When someone fills out a form on our website to request a meeting, download information or data sheets or proactively provide us with other personal information, or submit their resume, we collect that information. For example, when someone wants to download a data sheet or subscribe to our quarterly newsletter, a form appears requesting first name, last name and email address. In other circumstances, such as when you complete a form to schedule time to meet with a Smart Wires representative at a conference, we may ask you to provide other information, which may include your name, company name, email and phone number. We will never sell, trade, or give your information to any 3<sup>rd</sup> party. In addition, your device is automatically providing information to us so we can respond and customize our response to you. This generally includes technical information about your computer, such as your IP address or other device identifier and operating system version. It may also include usage information and information associated with your interaction with Smart Wires.

We collect only a very limited amount of personal data from visitors to our website. We use this contact information for our legitimate business purposes, such as authentication, account management, technical support, and sales and marketing. EU resident users who share their personal data with Smart Wires will always be asked to acknowledge and agree to sharing their information with us. Information is retained until they elect to opt out or if Smart Wires finds the email is invalid.

## What resources are available if I have further questions about GDPR compliance?

For more information about Smart Wires and GDPR, please [contact us](#). Further information on GDPR specifically can be found at [eugdpr.org](http://eugdpr.org).