

## Pedalo Data Privacy Statement

### What is GDPR?

The General Data Protection Regulation (“GDPR”) is a data protection regulation that the European Union issued in order to replace the European Data Protection Directive of 1995. The GDPR will directly apply to all member states of the European Union from 25 May 2018 forward. The GDPR applies to organizations both inside and outside the European Union that are processing the personal data of data subjects who are in the European Union.

### What is GDPR protecting?

GDPR is focused on the protection of the personal data of individuals in the European Union. Under the GDPR, Personal Data is defined broadly in Article 4 (1) as follows: “[A]ny information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.” Examples would be: name, personalized e-mail address, mail address, phone number, dynamic and static IP addresses etc.

### What are the requirements of GDPR?

There are 99 articles in the GDPR setting out the rights of individuals and obligations placed on organizations covered by the regulation. These include allowing people to have easier access to the data companies hold about them, a clear requirement for organizations to obtain the consent of people for which they collect information and a significant new monetary penalty regime. It should be noted, however, that, although GDPR includes important concepts like the right to be forgotten and privacy by design, GDPR is not a set of specific technical requirements. For the most part, it has left the technical methodologies, pursuant to which organizations choose to protect personal data and comply with the regulations, in the control of the organizations themselves.

### How does GDPR apply to Pedalo?

As a European Union based company, Pedalo processes the personal data of persons in the European Union, so will be subject to the GDPR. The GDPR has different requirements depending upon whether an organization is a “controller” or a “processor” of the applicable personal data. Pedalo will be a controller for the personal data which it collects in its marketing, CRM, HR, finance and other internal systems. For its product and service offerings, however, Pedalo will be a processor for personal data for which our business customers are the controller.

Customers will collect the personal information of individuals, their clients, through their websites or other applications, which Pedalo will then process through its products and services.

What is Pedalo doing for GDPR?

Pedalo's GDPR undertaking is a cross-functional/ cross-departmental effort, documenting and implementing all relevant requirements. Pedalo's GDPR focus has two parts, one that analyzes, documents and implements any additional data protection requirements in Pedalo's product and service offerings, as well as the systems used to deliver those products and services, and the other that analyzes, documents and implements any additional data protection requirements in Pedalo's internal systems. We already undertake systematic reviews of the data we store, manage, maintain, collect, process and control. This includes offline storage and paper records.

The GDPR project includes the following activities:

- Ongoing reviews of data held on all platforms used to provide services to our customers
- Ongoing reviews of data held on all platforms stored on internal systems
- Regular cleansing of data on all platforms used to provide products and services to our customers
- Regular cleansing of data on all internal systems
- Ongoing reviews of processes and procedures required to achieve/maintain compliance with GDPR
- Ongoing changes to our website and products based on the requirements
- Ongoing staff training to ensure data handling in compliance with GDPR

How long will your personal data be retained by us?

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your data for as long as needed in order to comply with our legal and contractual obligations.

Which rights do you have with respect to the processing of your personal data?

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Accenture no longer processes your personal data.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Accenture only processes your personal data in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to Accenture, or request Accenture to transmit such personal data to another data controller.

We do not pass on any personal information given us to any 3<sup>rd</sup> party. This will be treated as proprietary and confidential.

As we move forward, we will continue to monitor best practices in GDPR and data protection. For Pedalo, GDPR is one more important set of requirements to be implemented and maintained as part of our robust security program.

If you have any questions relating to Pedalo's data privacy statement, approach or commitment, please contact us at [privacy@pedalo.co.uk](mailto:privacy@pedalo.co.uk)