

# NAVEX and the General Data Protection Regulation (GDPR)

## What is the European Union (EU) General Data Protection Regulation (GDPR)?

The GDPR, which is enforceable beginning May 25, 2018, is a comprehensive reform of existing EU data protection law, expanding the rights of EU individuals and placing more stringent requirements on organizations that provide goods and services to individuals in the EU.

The new law applies not only to organizations that are located in the EU, but also those located outside the EU that offer goods or services to individuals in the EU. Any organization that fails to comply with the GDPR can be subject to a fine of 2% - 4% of global annual revenue. Naturally, the more serious the infringement, the higher the anticipated fine.

In addition to the GDPR's broad geographical reach and fines for non-compliance, other important aspects of GDPR are:

- Controllers (as defined under the regulation) must notify a supervisory authority within 72 hours of becoming aware of a breach of personal data unless the breach is unlikely to result in a risk to the individuals whose data was breached
- Products and services offered must be built using privacy-by-design as the default
- Privacy Impact Assessments must be performed by controllers, including assessments of its vendors and suppliers
- Training must be provided to employees reflective of their access to personal data and their job responsibilities
- Organizations must determine whether they are required to appoint a data protection officer (DPO)
- Compliance must be demonstrable—organizations must determine how they can demonstrate their compliance with the requirements.

To understand and learn more about the GDPR, visit the [EU GDPR webpage](#).

## How is NAVEX addressing the GDPR?

NAVEX recognizes the importance of data protection and has been working to align its own compliance with GDPR as well as to support the GDPR requirements of its customers. We continuously monitor and evaluate all global privacy laws, including those that may affect us directly or our customers in their use of our products and services.

We are carefully examining our obligations under the GDPR and are closely tracking applicable GDPR guidance issued by regulators in the European Union. As part of this process and in collaboration with internal groups, NAVEX works to identify any areas where changes are required to our business or products and services. Data privacy has always been critical to the value NAVEX delivers to our customers

## What does the GDPR mean for NAVEX Customers?

As a global organization that works with many multinationals, NAVEX processes personal data of EU individuals on behalf of its customers, which means that NAVEX and our ethics and compliance products and services are directly impacted by the GDPR. Many of our customers are also affected by the GDPR because they either conduct business within the EU and/or offer goods or services within the EU.

Within the GDPR, there are multiple definitions and requirements of multiple roles. NAVEX is a data *Processor* as it relates to its customers because NAVEX collects the personal data necessary to provide products and services in accordance with our customer's instructions and on their behalf. Our customers are data *Controllers* as they have the direct relationship with the users of our products and services and determine the extent of the processing activities.

To be sure, some of our customers do not operate in the EU and do not employ EU nationals, and are therefore not directly impacted by the GDPR. However, NAVEX has ensured that all of our solutions are aligned to support GDPR requirements and are available to all of our customers, whether or not the law directly applies to them.

## What does this mean for NAVEX products and services?

Under the instruction of our customers, NAVEX collects the personal data necessary to provide the products and services. NAVEX has current functionality documented in product online help and manuals to support our customer's compliance efforts.

As part of our continuous commitment to supporting our customer's compliance needs, NAVEX has worked to enhance the ability of our customers to access and manage their own data through self-help functionality to better manage their personal data in accordance with their internal policies and the applicable requirements of the GDPR.