



Aspect's Preparations for the EU's General Data Protection Regulation II

On May 25, 2018, the EU's General Data Protection Regulation (GDPR) becomes effective, replacing existing EU data protection laws based on the 1995 EU Data Protection Directive. The GDPR strengthens privacy rights for EU individuals and extends the scope of responsibilities for businesses processing personal data of EU individuals. This document updates Aspect's first Customer Advisory of July 2017, outlining in greater detail the steps Aspect is taking to comply with the legislation and equip our customers to do the same.

Under the direction of Aspect's global GDPR project team, Aspect has closely analyzed the requirements of the GDPR and is making the necessary modifications to its products and services, contracts, and documentation to support GDPR compliance for our customers.

Specific steps taken since July 2017 include:

- Aspect is finalizing a full information audit and data mapping exercise covering all personal information on data subjects processed by Aspect in its role as controller and processor. This effort includes all processing activities undertaken by Aspect by itself and on behalf of customers through Aspect's products and services. The level of detail includes, but is not limited to, the purposes of processing, data subjects, categories of personal data, lawful bases for processing, location of data and retention periods.
- Based on the results of the information audit described above, Aspect has been implementing additional privacy by design and default principles into our products and services (and any upgrades) to ensure features and functionality allow Aspect and its customers to comply with GDPR's regulatory requirements -- especially those relating to data subject requests for information, access, rectification, erasure or portability of personal data.
- Aspect is supplementing existing documentation to demonstrate compliance with GDPR principles, including technical and organizational security measures, documentation on processing activities and privacy-by-design and default measures. In addition, policies and procedures for each Aspect department throughout our organization are being reviewed and updated. Furthermore, Aspect provided initial training for each department handling personal data, including development and cloud operations, and will require global employee training specific for GDPR prior to May 2018.
- Aspect is developing an ongoing process to perform data protection impact assessments (DPIA) for its own business purposes to identify lawful methods for GDPR-compliant data processing. Aspect will also assist customers in conducting DPIAs as further specified in Aspect's standard contracts.
- Aspect is updating its existing data security breach processes to detect, report and investigate a data breach and help customers meet the notification and communication requirements under GDPR.
- As part of Aspect's global business organization, Aspect does transfer data to the U.S. and other countries outside the European Economic Area (EEA), providing adequate safeguards such as standard contractual clauses adopted by the European Commission per its decision of 5 February 2010 under Directive 1995/46/EC. Should the standard contractual clauses cease to exist or are no longer considered to be a lawful method of transferring personal data outside of the EEA,

Aspect will -- at its own cost -- comply with any alternative mechanism to enable and safeguard the transfer of personal data in a compliant manner.

- Aspect ensures that any vendors or third parties who process personal data as a (subsequent) processor to Aspect enter into a written agreement imposing upon such processors the same data protection obligations as are imposed on Aspect. This includes sufficient guarantees to implement appropriate technical and organizational security measures to meet GDPR requirements. Further, Aspect offers a GDPR-compliant mechanism to remove, replace or appoint suitable and reliable processors, as applicable.

In case of further queries, you may always reach out to Aspect at GDPR@aspect.com.

Thank you for your continued trust in Aspect.