

Introduction

The EU General Data Protection Regulation (“GDPR”) came into force on 25 May 2018.

The new Regulation aims to standardize data protection laws and processing across the EU, giving people greater rights to access and control their personal information.

Our Commitment

NetCasters Inc. is committed to ensuring protection of all personal information that we hold, and to provide and to protect all such data. We recognize our obligations in updating and expanding this program to meet the requirements of GDPR.

NetCasters Inc. is dedicated to safeguarding the personal information under our control and in maintaining a system that meets our obligations under the new regulations. Our practice is summarized below.

How We Prepared for GDPR

NetCasters Inc. already has a consistent level of data protection and security across our organization, but we have introduced new measures to ensure compliance.

Information Audit — We carried out an audit of information previously held and ensured that it was compliant with the new regulations.

Policies and Procedures — we have revised data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

Data Collection - NetCasters Inc. (operating TrainCaster Learning Management System) collects and stores data to allow users to access, resume and utilize TrainCaster LMS. The LMS requires the user’s first and last name. All other data is collected at the request of the client and includes information such as email address, job title, department, user type. The LMS tracks & stores information relevant to course assignments, course completion history, quiz scores, and training due dates. This information is stored to allow clients to determine training compliance within the organization.

Data Protection - our main policy/procedure document for data protection has been revised to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy and the rights of individuals.

Data Storage - The data collected is stored on our servers in a secure location. The servers are protected by biometric scanners, limiting physical access to the servers to a select few people. The servers operating system is patched nightly, ensuring the security updates are current at all times. A firewall is in place, and IP address tables are used to block access to the servers by known hackers. Individual password changes are required, and all temporary accounts/passwords are discarded

Data Retention and Erasure - we have updated our retention policy/schedule to ensure that we meet the "data minimization" and "storage limitation" principles and that personal information is stored,

archived and destroyed in accordance with our obligations. We have procedures in place to meet the new "Right to Erasure" obligation.

Use of Cookies - TrainCaster LMS uses cookies to enable users to access the application, initiate training, resume training, and view assignments. The LMS also tracks the IP address of a user to facilitate training access and as a security measure.

Data Breaches - our procedures ensure that we have safeguards in place to identify, assess, investigate and report any personal data breach as early as possible. Our procedures have been explained to all employees.

Data Breach Response Procedure - In the event of a data breach, NetCasters Inc. will inform clients of the breach within 72 hours of the event.

International Data Transfers and Third-Party Disclosures - where NetCasters Inc. stores or transfers personal information outside the EU, we have procedures in place to secure the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as binding rules, or standard data protection clauses for those countries without.

Subject Access Request (SAR) - we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge.

Privacy Notice/Policy - we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

Obtaining Consent - we have revised our consent mechanisms for obtaining personal data, ensuring that organizations understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information.

Data Subject Rights

We provide easy-to-access information during implementation of an individual's right to access any personal information that NetCasters Inc. processes about them and to request information about:

- what personal data we hold about them
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- how long we intend to store your personal data
- if we did not collect the data directly from them, information about the source
- the right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- the right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- the right to lodge a complaint or seek judicial remedy and who to contact in such instances.

Information Security and Technical and Organizational Measures

NetCasters Inc. takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. We have information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction.

GDPR Roles and Employees

NetCasters Inc. has a designated Data Protection Officer (DPO) and have appointed a data privacy team to assess our GDPR compliance, identifying any gap areas and implementing new policies, procedures and measures.

NetCasters Inc. understands that employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans.

If you have any questions about our GDPR compliance policies, please contact privacyofficer@netcasters.com.

Last reviewed 1 June 2020