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WHAT IS GDPR?

A new European regulation that governs data privacy for EU individuals.

A new privacy law called the General Data Protection Regulation (GDPR) takes effect in the European Union (EU) on May 25, 2018. The GDPR will strengthen and streamline data protection requirements across the EU. At its core, GDPR is about trust, calling for companies to handle the personal data of their EU customers, partners and employees with care and respect. CSG has been investing in its compliance not only to align our services to the new regulation, but also as an opportunity to deepen our commitment to data protection.

CSG IS PREPARED FOR GDPR COMPLIANCE

CSG takes data protection and data security seriously, as safeguarding the personal data entrusted to us on behalf of our customers, partners and employees is at the core of what we do. CSG is committed to GDPR readiness and to helping our customers comply with their GDPR compliance requirements. CSG has completed a comprehensive review of our impacted products, services, contracts, processes and policies and we have introduced controls, processes, accountability and ownership to ensure on-going compliance with GDPR regulations.

The following details several of our priority compliance measures:

SECURITY

CSG has in place appropriate security and technical measures to safeguard the personal data of our customers and their end users. CSG's data protection and security standards regularly pass rigorous third-party compliance audits for security, confidentiality, availability, processing integrity and privacy controls, and meet the highest standards in the industry.

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CROSS-BORDER DATA FLOWS

GDPR continues to allow the flow of personal data across country borders, and includes provisions ensuring existing data transfer mechanisms remain valid going forward. CSG has appropriate mechanisms to ensure protection of intracompany transfers of data. This includes our self-certification with the EU Privacy Shield Framework, as set forth by the U.S. Department of Commerce, which ensures compliance with data protection requirements when personal data is transferred between the EU-U.S. and Switzerland-U.S. and the use of intracompany transfer agreements. CSG also enters into standard/model clauses with its customers and vendors to ensure that cross-border data transfers have the appropriate protection.

PRIVACY REVIEWS

GDPR requires privacy reviews for many types of data processing. CSG routinely monitors any changes to our solutions, new technology, and ongoing operations for privacy impacts. While we do not anticipate any significant changes to robust methods already in place, internal compliance, legal and technical teams continue to monitor GDPR on an on-going basis to ensure our privacy reviews fulfill any new requirements.

PERSONAL DATA BREACHES

GDPR introduces new notification rules for certain breaches of security that lead to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. CSG has a formal Security Incident Response Team, as well as processes and protocols in place and in practice to promptly respond to security incidents and to align our communications with customers, business partners and employees with these notification requirements.

ACTIVITY LOGGING

To help customers protect personal data against security threats, many CSG systems, products and applications log activity and transactions associated with them. Administrators can view and audit reports to see data changes made within the system in given time periods. As it relates to GDPR, this captures access monitoring and oversight, displaying a high level of compliance assurance.

INDEPENDENT AUDITS/RISK MANAGEMENT

CSG's Internal Audit department oversees many activities and procedures as part of a rigorous and robust audit program that routinely tests controls against industry standards (encompassing CSG policies), monitors risks and takes action to address and mitigate such risks.

PARTNERING WITH THIRD PARTY SUPPLIERS FOR GDPR COMPLIANCE

CSG is conducting third party supplier due diligence to ensure that our suppliers are compliant with GDPR in accordance with our requirements. We are also ensuring that we have in place GDPR compliant terms with our vendors.

POLICIES, PROCEDURES AND TRAINING

We have developed a range of internal communications and training initiatives to ensure employees are made aware of GDPR requirements and appropriate data privacy measures, to familiarize them with new operating standards and to promote the key principles of GDPR. We are also updating our internal policies and procedures, including our Global Privacy Policy to ensure alignment with the requirements of the GDPR.

Furthermore, CSG is enhancing its ongoing commitment to privacy by design and working to embed data protection principles even more deeply into its business processes. Our objective is that technical and organizational security measures will limit, by default, the amount and use of EU personal data to what is specifically required. CSG is updating its commercial offerings and ongoing operations (including updates and changes) to take privacy into consideration and allow a controller the means to implement measures to minimize data collected, limit access to the data and otherwise implement appropriate technical and organizational measures to safeguard the data.

CSG'S ROLES UNDER GDPR

Under the GDPR, CSG is a Data Processor with respect to certain solutions and services provided to its customers that collect, store, use and/or transfer personal data of EU individuals. As an employer with EU employees, CSG is a Data Controller.

FOR OUR CUSTOMERS

At CSG, we work to earn the trust of our customers every day. As such, protecting the privacy and security of our customers' information is a top priority, and compliance is central to this mission. We'll continue to evolve our capabilities in accordance with the changing regulatory landscape and work with you to help facilitate your GDPR compliance efforts.

When it comes to GDPR compliance, CSG and its customers have specific responsibilities, and compliance with GDPR requires a partnership approach. CSG is a "Data Processor" for many of our customers, which means we process personal data in accordance with instructions given by our customers (many of whom are "Data Controllers", because they determine the purposes and means by which personal data of their end user customers is processed).

CSG has engaged with many customers to enter into data processing agreements, and our customers have found CSG's own data processing agreement to be a streamlined, efficient and compliant method of capturing each party's respective rights and obligations under the GDPR. Our data processing terms clearly articulate our privacy commitments to customers and are designed to be GDPR compliant. Please email privacy@csgi.com for a copy of CSG's customer data processing agreement.

Additionally, we invite you to consider how you can leverage CSG's products and services as part of your own regulatory compliance framework. While our customers must obtain their own legal counsel to understand how any regulatory obligation, including the GDPR, may impact their processing of personal data, CSG recognizes that our customers will rely on our offerings and technical assistance to achieve GDPR compliance within their own organizations and CSG is well-positioned to meet this critical need. CSG has taken many steps in its role as a Data Processor to support our customers in their role as Data Controllers, including:

- a) Providing the necessary information to assist our customers to create (where applicable) Data Protection Impact Assessments (DPIAs);
- b) Assisting our customers, where applicable, with implementing measures to comply with the rights of data subjects and their personal data, as expanded under GDPR;
- c) Ensuring GDPR-compliant engagement of sub-processors; and
- d) Providing our customers with information necessary to demonstrate compliance with the GDPR.

We would be happy to speak with you about GDPR impacts, our compliance and demonstrate GDPR compliant functionality within our products and services upon request. Our software enhancements for GDPR compliance, where applicable, have been, and will be, made available in the latest 2018 spring releases.

POINT OF CONTACT

To confirm our commitment to data privacy governance, CSG has recently appointed Lindsay Martin as our new Executive Director, Global Privacy. You may contact her at lindsay.martin@csgi.com, or at privacy@csgi.com, for questions, requests or additional information.