



TOGETHER, YOU WIN.

DATA PROTECTION AT CSG

Data protection has always been a fundamental priority at CSG and safeguarding the personal information entrusted to us on behalf of our customers and employees is at the core of what we do.

We are intensely focused – obsessed, really, with our customers’ success, in all that we do to support their business and to achieve their goals. This includes compliance with GDPR, as described below.

What is GDPR?

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

On May 25, 2018, a new, pervasive privacy law called the General Data Protection Regulation (GDPR) takes effect in the European Union (EU). The GDPR is designed to protect and empower data privacy rights for EU individuals, giving them greater control over their data. At its core, GDPR is about trust, calling for companies to handle the personal data of their customers, partners and employees with care and respect. It places many new obligations on organizations that market to, offer goods or services to, or track or handle personal data of, EU individuals, no matter where an organization is located.

How does GDPR affect CSG?

Under 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.

What is CSG doing about it?

CSG is committed to GDPR compliance across its affected products, services and employee relations. For our customers that have Data Controller obligations under the GDPR, we are here to help our customers in their efforts to comply with GDPR.

We have closely analyzed the requirements of GDPR and where necessary, are implementing the necessary enhancements to our products, contracts, policies, procedures and controls to help support CSG’s and our customers’ compliance with GDPR.

1. Partnering with Customers for GDPR

When it comes to GDPR compliance, CSG, its vendors, and customers have specific responsibilities, and compliance with GDPR requires a partnership approach. With respect to our relationship with many of our customers, CSG is a “Data Processor”, 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).



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CSG takes many steps in its role as a Data Processor to support our customers in their role as Data Controllers, including:

- a. Updating, where necessary, our data processing agreements with customers, to ensure specific provisions relative to each party's respective rights and obligations under GDPR are included. Strong data protection commitments between CSG and its customers are fundamental to compliance. Our data processing terms will clearly articulate our privacy commitments to customers, and will be GDPR compliant;
- b. Providing the necessary information to assist our customers to create (where applicable) Data Protection Impact Assessments (DPIAs);
- c. Assisting our customers, where possible, with implementing measures to comply with the rights of data subjects and their personal data, as expanded under GDPR;
- d. Ensuring GDPR-compliant engagement of sub-processors; and
- e. Providing our customers with all information necessary to demonstrate compliance with the GDPR.

2. 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.

3. 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 and its customers enter into Data Processing Agreements that govern and ensure adequate safeguards for the handling of our customer's end user's personal data. Via these agreements that invoke best practices for security and privacy measures, we are legally permitted to transfer and process end user's personal information across borders in reliance on certain cross-border transfer provisions and safeguards. This includes our self-certification with the EU Privacy Shield, which ensures compliance with data protection requirements when personal data is transferred between the EU-U.S. and Switzerland-U.S.

4. Privacy impact assessments (PIAs):

GDPR requires PIAs 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 to ensure our PIAs fulfill any new requirements.

5. Personal data breaches:

GDPR introduces new notification rules for any breach of security that leads 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 that align with these notification requirements.

6. Activity logging:



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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.

7. 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, and regularly monitors risks, acting to address and mitigate such risks.

CSG's Commitment to Data Protection

We take data protection, security and compliance seriously, and welcome the GDPR as an important step forward in streamlining data protection requirements across the EU and as an opportunity to deepen our commitment to data protection.

CSG plans to make additional operational changes in light of the new legislation, collaborating closely with our customers and partners throughout this process. An updated data processing amendment will be available to our customers soon.

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.

For our customers

Although the GDPR is not enforceable until May 25, 2018, CSG has been preparing for several months.

Additional resources will be made available by CSG to customers in the months leading up to GDPR enforcement. Our goal is to assure our customers that CSG will take the necessary and required actions to comply with GDPR.

Additionally, we invite you to consider how you can leverage CSG's products and services as part of your own regulatory compliance framework and would be happy to speak with you about GDPR impacts and compliance.