

Service Description

Data Privacy Consulting

Contents

Data Privacy Consulting	3
Service Description	3
Base Service features	3
SecureTrust Portal.....	3
Global Compliance & Risk Services	3
Delivery and implementation.....	3
Project Initiation	3
Consulting Engagement	4
SECURETRUST RESPONSIBILITIES	4
CLIENT RESPONSIBILITIES.....	4

Data Privacy Consulting

SecureTrust™ is a division of Trustwave Holdings, Inc.

SERVICE DESCRIPTION

SecureTrust's Data Privacy Consulting is a professional services engagement. Privacy Consulting is designed to assist and guide Client in review and examination Client's data privacy management programs.

BASE SERVICE FEATURES

SecureTrust's Data Privacy Consulting includes the following standard features:

SecureTrust Portal

The SecureTrust Portal consists of, among other features, a Compliance Manager application to manage the engagement process as well as collect and securely store evidence, documentation, and final deliverables.

Global Compliance & Risk Services

The Global Compliance and Risk Services (GCRS) team consists of, among others, the following key personnel and functions:

Security Consultant – An information security consultant is the primary resource for the fulfillment of the service and is responsible for scheduling and conducting consulting activities.

Managing Consultant (MC) – An MC provides guidance, project oversight and reporting quality assurance to the Security Consultant and serves as a secondary point of contact for escalations and queries.

Data Privacy Consulting – Consulting services to assist and guide Client in review and examination of Client's data privacy management programs. The Security Consultant will provide Client with guidance and recommendations in of support data privacy management programs.

DELIVERY AND IMPLEMENTATION

Project Initiation

The GCRS team is assigned to facilitate delivery of the service, which includes scheduling and conducting the remote kickoff meeting. The kickoff meeting will be used to define and agree to a high-level project plan consisting of milestone dates, key steps, estimates for duration, resource requirements and escalation procedures.

Consulting Engagement

SecureTrust's security consultant will work with Client to help review and examine their data privacy management programs. SecureTrust Data Privacy Consulting activities may include, but are not limited to the following:

- Help Client understand privacy regulation and data protection requirements;
- Prepare and coach Client;
- Review and provide guidance for the design and implementation of privacy and data protection controls;
- Advise Client of identified data protection gaps;
- Identify and prioritize remediation actions to improve and enhance data privacy management programs; and
- Provide recommendations for remediation of compliance and data protection issues.

SecureTrust will conduct a closeout meeting with Client, if desired.

SECURETRUST RESPONSIBILITIES

- Establish and maintain contact with Client.
- Establish communication and escalation plans.
- Create a Client account in the SecureTrust Portal.
- Define high-level project plan consisting of milestone dates, key steps, estimates for duration and resource requirements.
- Schedule and conduct kickoff and consulting meetings.

CLIENT RESPONSIBILITIES

- Establish and maintain contact with SecureTrust.
- Establish communication and escalation plans.
- Agree to high-level project plan consisting of key steps, estimates for duration and resource requirements.
- Accurately provide all necessary information including key stakeholders, applicable Client environment information and configuration requirements.
- Inform SecureTrust of all Client environment maintenance activity and changes that may impact delivery of the service.
- Accurately respond to requests from SecureTrust teams when establishing contact and collecting information.
- Provide complete and accurate details of the relevant environment and other business operations information.
- Make available resources capable of participating in consulting activities in relation to Client's environment.
- Participate in and understand materials explained during calls, meetings, interviews, discussions, facilities inspection and controls analysis.
- Client acknowledges:
 - All security and feature updates for SecureTrust Portal software will be included in major version release upgrades.
 - Personnel from the following departments are generally involved:

- Operations, Security Governance, Information Technology, Enterprise Risk Management, Legal and Compliance, Procurement, Internal Audit, Human Resources, Facilities, Complaints, and Finance.
- Third party data brokers, controllers or processors.
- Privacy Officer or Data Protection Officer.
- The engagement consists of remote consulting.
- The project start and end dates will be determined during the kickoff call.
- SecureTrust may request information about Client's systems and processes as required to describe Client data privacy management programs. Client agrees to provide all such information in a timely manner.
- SecureTrust is not responsible for defining systems in scope or whether information provided by Client is accurate.
- SecureTrust retains the right to reject or accept Client comments based on the facts and circumstances of the service.
- SecureTrust will perform the service in the English language.
- SecureTrust will not provide remediation services as a part of the Data Privacy Consulting.
- SecureTrust will not offer any legal guidance or counseling. The provision of Data Privacy Consulting does not guarantee compliance with data privacy regulation. Client is responsible for making all management decisions with regard to its data privacy policies.
- The quality and accuracy of the service is dependent on Client's provision of accurate information and access to Client systems and resources to SecureTrust.