

# Colt's Data Protection Compliance Statement

## TO WHOM IT MAY CONCERN

**Alessandro Galtieri**, in his capacity of Group **Data Protection & India Grievance Officer** of the Colt, **ACKNOWLEDGES** that:

Colt is strongly committed in maintaining the privacy of the personal data processed in the course of its business activities, and to complying with applicable laws and regulations regarding the processing of personal data. To this end, Colt has implemented a global privacy compliance programme applicable to all Colt entities, which has been audited, validated and approved by the European Data Protection Board (EDPB) through its Binding Corporate Rules (BCRs) certification. The programme comprises a series of policies, controls, measures and procedures, some of which are set out throughout this statement.



### Certifications

- Colt has obtained approval for its BCRs, both as Controller and Processor. They allow Colt to maintain the same levels and standards of privacy compliance throughout the group worldwide, safely transferring personal data outside the EU within the group. Colt is the first and unique telco company in having post-GDPR approved BCRs, both as Processor and Controller. Decisions approving Colt BCR can be found on the EDPB's website [here](#).
- Colt adheres to the Telecommunications Code of Conduct approved by the Austrian Data Protection Authority (DSB).



### Governance and organisational measures

- Colt has a global structure responsible for data protection and data protection governance which is organised around the following instruments; (i) a data protection governance model approved by the Management Committee, (ii) a Group Data Protection & India Grievance Officer, (iii) a global network of Local Data Protection Officers coordinated by the Group Data Protection Officer, (iv) a global network of representatives per country and per business area, (v) a Data Protection team, (vi) a Security and Privacy committee and (vii) a Policy governing data protection governance.
- Colt has a Global Privacy Policy, which sets out the principles underpinning Colt's global data protection strategy. This policy, as well as all the policies set out in this statement, has been approved by the Group Data Protection & India Grievance Officer, notified and published on the intranet, available to all employees.
- Colt has implemented the following Policies and Guides:
  - Global Privacy Policy
  - Corporate Web Privacy Policy
  - Data Protection Governance Policy
  - Destruction and Retention Policy

- Maximum Retention Period Policy for HR
  - External Collaboration Standard
  - International Data Transfer Policy
  - Privacy by design and by default Policy
  - Vendors Data Privacy Compliance Policy
  - DSAR Procedure
  - Data Breach Procedure
  - RoPA Process Guide
  - PIA Completion Guide
  - Data Deletion Certificate Guide
- Colt keeps Record of Processing Activities (RoPA) both as Controller and as Processor -by meaning of Article 30 GDPR- as well as a Data Mapping. These inventories are revised and updated regularly.
  - Colt has implemented a procedure to attend Data Subject Rights and complaints in due time and manner. Data subjects are informed of such procedure in a clear and comprehensive way by means of Colt's Privacy Notice [www.colt.net/legal/data-privacy/](http://www.colt.net/legal/data-privacy/).
  - Colt has implemented a procedure for conducting Data Privacy Impact Assessments (DPIA) of new systems, projects or data processes in the cases set out in article 35 GDPR following EDPB guidelines and to local authorities' opinions.
  - Colt has a process for the management and notification of personal data breaches to the interested parties within the legally required timeframe, managed by a 24/7 enabled team.
  - All Colt employees receive appropriate training about Colt's global privacy compliance programme.
  - Colt may transfer personal data or makes personal data accessible to its subsidiaries (<https://www.colt.net/legal/>), subcontractors or otherwise located within or outside of the EEA or UK for the provision of the services. Colt transfers the personal data in compliance with Data Protection Laws and with EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. The transfers within Colt Group are carried out by means of its Binding Corporate Rules (BCRs). The transfers outside of Colt Group are carried out on the basis of an adequacy decision of the European Union or, failing that, on the basis of appropriate safeguards as the Standard Contractual Clauses and, where applicable, supplementary security measures.
  - Colt has implemented several technical and organisational measures for ensuring privacy by design and by default, including the following: (i) pseudonymisation; (ii) encryption of communications; (iii) automated deletion of data; (iv) regular checks to ensure personal data accuracy; (v) access controls; (vi) anonymisation; (vii) privacy preference panels, etc.
  - Colt is certified to ISO/IEC 27001 – Information Security Management System (ISMS).

Please keep the information contained in this document confidential and not disclose it outside the scope of your company or group, except, of course, in case of legal or regulatory obligation.

For any further information, please contact the Data Protection team ([gdpr@colt.net](mailto:gdpr@colt.net)).

**Alessandro Galtieri**

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**COLT TECHNOLOGY SERVICES**



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