



Data Protection Policy

Cygna Labs Support Systems

Introduction

This document summarizes the data protection policy of Cygna Labs with respect to use of Cygna Labs Technical Support Systems. This policy applies to all personal data processed by the Cygna Labs. This document defines the data that we collect, our use of the data, and your rights with respect to your data.

Our Data Protection Principles

Cygna Labs is committed to processing data in accordance with its responsibilities under the (DPA) Data Protection Act 2018 which implements the EU's General Data Protection Regulation. The DPA requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.”

Personal Data Collected

The scope of personal data that Cygna Labs may collect includes but is not limited to the following:

- Personal data supplied in customer databases or logs that may be provided for customer support purposes. This includes any information about customer employee staff such as IDs, email addresses, first and last name, and any other personal data that was entered into the system.
- Personal data supplied by the customer which includes customer Billing or Technical contact information.

Cygna Labs attests that personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed. Cygna Labs also attempts to verify that provided personal data is accurate. Where necessary for the lawful basis on which data is processed, Cygna Labs endeavors to keep personal data up to date.

Use of Personal Data

It is Cygna Labs policy that all data processed by Cygna Labs must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, or legitimate interests. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems.

Data collected is used to support our customers technically and to reproduce and troubleshoot issues as requested by the customer to further their resolution. Data is also used for sending communications to our customers which includes technical, financial, and management purposes.

Handling of Personal Data

Data protection of personal data shall be enforced by design and by default. Cygna Labs has implemented appropriate technical and organizational measures to demonstrate that we have considered and integrated the principles of data protection into data processing activities. This includes such measures as encrypting data, implementing access controls, and regularly updating security protocols as follows:

- Cygna Labs stores personal data securely using modern software that is kept up to date.
- Cygna Labs protects personal data by following all of its ISO 27001 procedures and policies, including protecting the data-at-rest and protecting the data-in-motion.
- Access to personal data is limited to personnel who need access and appropriate security should be in place to avoid unauthorized sharing of information.
- When personal data is deleted, it is done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions are in place.
- No customer identifiable data is transferred to one of Cygna Labs' third parties without the express written permission from the customer.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, Cygna Labs shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office (ICO <https://ico.org.uk>).

User Rights

You have the right to access, view, modify and delete any or all personal data stored by Cygna Labs by contacting the Cygna Labs Technical Assistance Center (TAC) via our ticketing system. In fact, you may view your own personal data by viewing your profile in the ticketing system, and if you require further information or assistance, please open a support ticket. TAC contacts, escalations, and support system URLs are provided in your Service Level Agreement.

Policy Governance

The Cygna Labs Information Security Officer has the responsibility for Cygna Labs' ongoing compliance with this policy.

About Cygna Labs

Cygna Labs is a software developer and one of the top three global DDI vendors. Many Fortune 100 customers rely on Cygna Labs' DDI products and services, in addition to its industry-leading security and compliance solutions to detect and proactively mitigate data security threats, affordably pass compliance audits, and increase the productivity of their IT departments. For more information, visit <https://cygnalabs.com>.

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