

GDPR Statement



Background

The deployment of effective, relevant information security and data protection controls is fundamental to Realtec's provision of Cloud Services. Realtec is committed to securing and protecting the personal data in its custody.

The General Data Protection Regulation (GDPR) comes into force on the 25th May 2018, at which point it will supersede the current Data Protection Act 1998 (DPA).

While GDPR is a complex piece of legislation, it is important to remember that it builds upon the requirements defined within the DPA, which already provides a substantial body of law around the security and protection of personal data.

Realtec already complies with the DPA. Realtec's own GDPR programme has been structured to critically assess the existing information security and data protection controls against the more prescriptive requirements of GDPR. Where necessary, the existing controls within Realtec's Information Security Management System (ISMS) have been updated, extended.

What Personal Data is Realtec collecting and how it is processed?

As a Data Controller, our collection of personal data is limited to only data necessary for the purpose of supporting an effective business relationship with our Resellers and direct customers. Reseller (Customer) name and contact details are collected, together with other business data, such as, business address, business contact and payment details.

As a Data Processor, the collection of personal data, provided by the Reseller or authorised user within the end-user's organisation, is limited to the online user-id of the end-user, for the purpose of facilitating the consumption of the selected Realtec service.

Realtec does not collect any special category of personal data.

Realtec will only process personal data where:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; or
- processing is necessary for compliance with a legal obligation to which Realtec is subject, or
- where the data subject has given consent to the processing of his or her data for one or more specific purposes

The Realtec Privacy Policy, available on the Realtec website (<https://www.realtec.co.uk/gdpr>) provides additional information on how Realtec commits to handle personal data in line with GDPR.

A data mapping exercise has been conducted for both Realtec's customer services and internal systems. These, in turn, have fed into a series of Data Privacy Impact Assessments, to identify potential risks to the security and privacy of the personal data. Where necessary, additional controls have been implemented to mitigate any potential risk.

Realtec's relationship with third parties.

Reseller / Customer

Realtec's Customer Agreement documents have been updated to incorporate the required GDPR clauses. These are available to the Reseller and Customer community through the Realtec Cloud Market portal.

The Service Specific Terms (SST) which describe each of the services offered by Realtec are being updated to satisfy the requirements of GDPR. All of the updated SSTs will be available from the website portal before 25th May.

Cloud Market Vendors

Each Cloud Market vendor has provided, or committed to providing, a revised GDPR contract (or addendum) by 25th May. The revised contractual terms will be reflected in the updated SSTs, thus ensuring the obligations to secure and protect personal data and the need to support the Data Subject in exercising their fundamental rights is contractually recognised across the service delivery supply chain.

Other suppliers

Realtec has also updated its contractual terms, in line with GDPR, with the suppliers and partners that process personal data in support the Realtec internal business processes. As above, the revised contractual terms ensure the obligations to secure and protect personal data and the need to support the Data Subject in exercising their fundamental rights is recognised by our suppliers.

The Realtec Privacy Policy (<https://www.realtec.com/gdpr>) provides additional information on which categories of organisations we disclose personal data in support of our internal business processes.

Realtec's technical and organisational controls.

Realtec's IT architectural model is based upon industry standard equipment and operating system software, deployed across two geographically separated datacentres. A highly resilient network, sourced from two suppliers, provides connectivity to the Internet and between the two datacentres, allowing services to be delivered from either datacentre.

The deployed network security architecture utilises dual firewalls, proxy servers and a structure of core network switches configured to deliver the required network segmentation to protect the production environment from unauthorised access. Annual network penetration tests are conducted by an independent third party.

The hardware infrastructure supporting the delivery of the Realtec services is configured with the required level of resilience to meet the committed service availability levels, with a level of redundancy built into the individual hardware components.

All server hardware is protected by Bitdefender anti-virus. All servers are subject to a regular schedule of vulnerability scans and subject to a formal Patch Management Policy. All servers are visible to, and managed through, a well-established availability and performance monitoring regime. Logging and audit information is captured for critical resources.

Encryption of 'data at rest' is based on server hardware encryption techniques. All emails received into, or sent from, the Realtec hosted email services are subject to TLS encryption.

Access to all Realtec resources is controlled through the Microsoft Active Directory architecture. All granted access rights are on a 'least privilege' basis, in support of a role-based security model.

Realtec has appointed a DPO, suitably qualified, to independently assess our compliance to GDPR. A Data Privacy training module has been added to our standard business procedures.

Supplementary classroom sessions are also scheduled for the coming months. All employees have signed confidentiality agreements, and are exposed to on-going training for information security and data privacy throughout the year.

All Information Security Policy and Procedure documentation within the Realtec ISMS has been reviewed and updated, as required. Realtec's ISMS aligns to the requirements of Cybersecurity Plus. The process to gain formal certification has already commenced.

Project Management within Realtec has been enhanced to embrace the 'Privacy by Design and by Default' philosophy embodied in GDPR.

Realtec has upgraded its Incident Management System to include the 72-hour breach notification requirement.

Summary

As noted earlier, effective information security and data protection controls is fundamental to Realtec's market proposition as a leading provider of Cloud Services. Realtec is committed to securing and protecting the personal data in its custody.

Building on an existing, comprehensive base, the GDPR Programme has further strengthened Realtec's information security and data privacy controls.

Realtec is committed to its obligations under GDPR, both in its role as Data Controller and as a Data Processor.