

## SMSCLUB'S GDPR COMPLIANCE STATEMENT

The following is an addendum to Smsclub's Privacy Policy and Terms and Conditions to cover the EU General Data Protection Regulation which comes into effect on May 25th 2018.

1. We have conducted an audit of all information we hold for our customers SMS Marketing requirements.

Smsclub holds names, email address, phone numbers and dates of birth of data subjects on behalf of our customers.

Only the mobile number of the data subject is required when importing into a Smsclub account. The rest are optional.

This data is obtained by our customers importing it into their Smsclub accounts. Smsclub makes all customers aware of their Data Protection responsibilities and that consent must have been given for SMS Marketing purposes.

The data is held only as long as our customers account remains open. If a customer's wishes to close their account, all data is then deleted. After you have closed your account we may retain Personal Data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Terms of Service, offer new features you may be interested in, or fulfill your request to "unsubscribe" from further messages from us. If none of these obligations apply we will delete Personal Data within 12 months of your account being closed. We will retain de-personalized information after your account has been closed.

2. All Smsclub servers are based in the EU.

3. All customers have access to view their data using their secure login and password. They can add, delete or modify any inaccuracies in this data. Customers have full control over their data. SMSclub provides clarifications on the use of customer data upon request.

4. Smsclub also provides a free opt-out service for all data subjects. It is a clearly identifiable opt-out mechanism and is available to all our customers free of charge.

5. Smsclub processing SMS on behalf of our clients for marketing, appointment reminders and information purposes.

6. Smsclub makes all customers aware of their Data Protection responsibilities and that they have received consent from their data subjects to contact them.

7. Smsclub servers both Production and Disaster Recovery are located within the EU. No data on either environment leaves the EU at any point. The data centre services provider who hosts and manages the secure environment for our servers is ISO 27001 certified.

The Smsclub System employs security protocols to block illegal application requests. All access to system backend is locked down by specific IP whitelist.

8. The Smsclub System is monitored 24/7 by our own engineers. The engineers receive alerts to any suspicious activity or unusual network traffic. On a positive identification of a data breach, our policy is to alert all Data Controllers immediately. Any data breaches will be reported to both our customers and the DPC within 72 hours.

9. Any questions relating to Smsclub's GDPR compliance or GDPR Compliant SMS Marketing should be sent to [dpo@smsclub.mobi](mailto:dpo@smsclub.mobi).