



General Data Protection Regulation (GDPR)

Frequently Asked Questions

Imprivata has formed a business project initiative involving key corporate personnel and an external consulting team for guidance as the compliance date nears. The team has identified in-scope applications, systems, third party services, and personal data elements maintained within the company that fall under the protection of the GDPR. As a result of these efforts, our team has developed and prioritized an action plan ranging from GDPR awareness campaigns and employee training to the modification of data handling policies and resulting system configurations.

Commonly asked questions about GDPR readiness are addressed here, as these may be helpful to your understanding of our attention to and preparation for this new legislation.

✓ **Has Imprivata performed an assessment to determine its GDPR scope?**

Yes, Imprivata has tasked local "Data Stewards" within its departments and business functions with carrying out information gathering activities. This information gathering exercise documents all of Imprivata applications, systems, third party contract providers, and data elements subject to the GDPR. The data collection results are validated by management for accuracy and completeness, and serve as the foundation for the company's gap analysis and resulting implementation plans.

✓ **Is Imprivata updating security policies and processes to incorporate GDPR requirements?**

Yes, Imprivata is evaluating policies, including Information Security and Data Retention policies, and is modifying these as appropriate for GDPR compliance. Imprivata has engaged external consulting services to assist in updating the policies with the necessary revisions.

✓ **Has Imprivata considered system configurations in the scope of GDPR preparations?**

Yes, Imprivata has identified system changes that will need to be addressed to incorporate the necessary GDPR components. Imprivata plans to implement changes to its system development lifecycle (SDLC) to identify projects that require a Data Protection Impact Assessment (DPIA), and to incorporate the principle of data protection by design and by default.

✓ **What about data privacy and consent notices? Are existing notices being updated to comply with the stricter requirements under GDPR?**

Yes, Imprivata has engaged consulting services to review and modify data privacy and consent notices as well as identify the scope in terms of employees, websites, and applications. Updated data privacy notices will be applied as follows: websites will be modified; vendor and customer contracts will be amended; and internal policies will be revised, approved, and distributed.

✓ **Does Imprivata provide data subjects the right to access their information?**

Yes, GDPR gives a data subject rights of access, which are most often used by individuals who want to see a copy of the information an organization holds about them. The right of access goes further than this and allows them to be: (i) told whether any personal data is being processed; (ii) given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organizations or people; (iii) given a copy of the information, and given details of the source of the data (where this is available); (iv) request that the data be modified, restricted, or erased; or (v) opt-out of further data collection or processing. Imprivata will respond to a subject access request promptly and in any event within 30 calendar days of receiving it.

✓ **Is Imprivata educating the business on GDPR and the handling of Subject Requests?**

Yes, Imprivata plans to distribute a training curriculum with content such as the handling of subject requests, policies overview, and data privacy impact analysis. Additionally, Imprivata has engaged consulting services to assist in updating its personal data breach and Incident Response procedures.

✓ **Is Imprivata preparing guidelines to ensure that GDPR considerations are incorporated into business activities such as vendor selection and system implementations?**

Yes, Imprivata has engaged consulting services to prepare assessments for future use in vendor selections and system implementations. These assessments will provide data protection by design and default, and include a data protection impact analysis.

Imprivata is dedicated to the security and privacy of our employees and customer's data. If you have any questions about Imprivata and GDPR readiness, please contact the Imprivata Legal Department at dept.legal@IMPRIVATA.com

Thank you,

A handwritten signature in black ink, appearing to read "Jeffrey Kowalski".

Jeffrey Kowalski
Director, Legal & Data Protection Officer