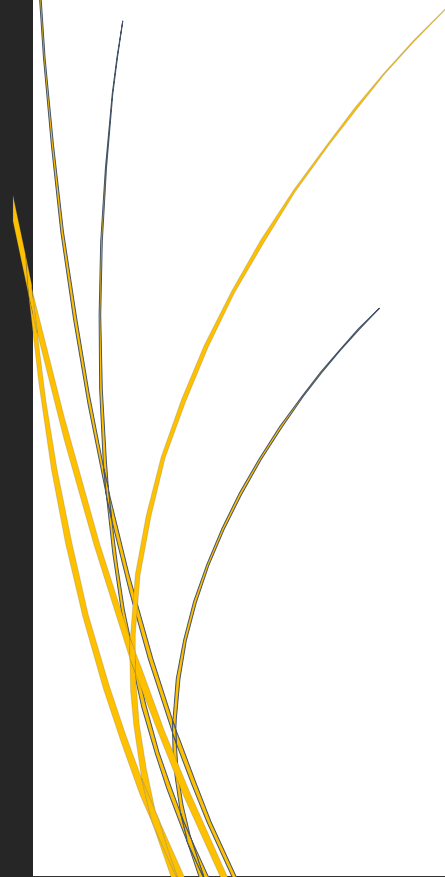


# GDPR Compliance Statement



**REVISION CONTROL**

Date	Version	Summary of changes made	Changes made by
03/20/2018	1.0	Initial document release	Andrei Sarbu
12/17/2020	1.1	Updated clauses on data protection	Alison Wallis

**DATA PRIVACY AND PROTECTION CONTACT INFORMATION**

High Tech Dev Ltd  
Rosetrees Lane,  
Blackbank, Longtown, Carlisle, CA6 5LS

UK: +44 1625 836-307

UK Company Registration No: 08170143

**Data Protection Officer (DPO):** Rob Wallis. [Privacy@HighTech.Dev](mailto:Privacy@HighTech.Dev)

Please note: The above email address is for you as the client and data controller only and not to be provided to any third parties or clients.

**Metadata Data Storage:**

- EU - Frankfurt

**Media Storage in AWS S3:**

- EU – London, Frankfurt
- APAC – Singapore, Tokyo, Shanghai
- US – Virginia, California
- AU – Sydney

For more detail, please see the global architecture section.

## ABOUT HIGH TECH DEVELOPMENT

High Tech Development (HT) is a Live and VOD streaming service provider for the market research industry. HT provides Mobile, in-home, in-facility, IOT solutions to simplify video content creation and delivery.

HT is a global video distribution provider with an integrated platform built on top of cloud content delivery system. We use EDGE IOT or nodes to process and distribute live and archive video across the globe with sub-second low latency.

HT focuses on automation of content creation and distribution. HT provides a full stack set of tools for the clients to self-manage their research and services. Clients, Agencies and Facilities are in full control of their content and data collection and processing. HT processes respondent and user data solely under instruction of our client. All recordings created in the EU or UK are deleted after 30 days from our servers.

## PRODUCTS AND SERVICES

HT provides the following products:

- Annabella ( HT Face ): full stack video conferencing platform.
- HT Arthur: full stack, self-managed, facility streaming solution.
- HT Anton: mobile streaming and research for non-facility based research, with global reach.
- HT Jack: Desktop UX research with global reach.

All of HT products are integrated and interconnected into one simple to use SaaS online platform that automates and streamlines the online experience.

HT global platform and products are architected and built on the same privacy and security fundamentals required by trade commission for Wall Street trading floors.

HT has been created to meet all the required certification criteria for SSAE 19, GDPR and TCPA including the second revision of TCPA.

## GLOBAL ARCHITECTURE – DATA SECURITY

The SaaS offered products and online global platform use internally a VPN with no public exposure. All products communicate directly via VPN in conjunction with AWS firewalls and filters, to the Amazon AWS Geo located Private Clouds and data centers. The public areas of the portal are exposed only through HTTPS using encrypted SSL connections and allow access only to permitted users.

There are currently no 3rd party systems that connect to our system. Upon client request there are times that we help streamline data for our clients' by pushing feeds. A separate contract and security evaluation is required.

Additional security and controls are detailed in [Information Security - Classification and Handling Policy](#).

Attached is the global reach that the HT infrastructure uses.



## DATA OWNERSHIP

All research is managed and owned by our clients, dictating the governing controls of origin of the data. Furthermore, our clients control the content, data and access to every part of the research. HT provides a responsible media and data ownership for the inflight data.

## OWNERS AND PRODUCTION INFORMATION

All electronic information managed by the HT Information Technology (IT) group must have a designated Owner. Production information is information routinely used to accomplish business objectives. Owners should be at the VP level or above. Owners are responsible for assigning appropriate sensitivity classifications as defined below. Owners do not legally own the information entrusted to their care. They are instead designated members of the HT management team who act as stewards, and who supervise the ways in which certain types of information are used and protected. Andrei Sarbu is the sole data and media owner for HT. Rob Wallis, is responsible for Data and Media Protection, implementation of all setup and maintenance of business procedures and operations in regards to data protection.

## PRODUCT DATA USAGE AND STORAGE DETAIL

### ANNABELA ( HT Face )

HT Face is a SaaS product and provides global reach video conference service.

All moderators, participants and respondents are joined on the fly across multiple EDGE cloud nodes, closest to them.

No local or EDGE cloud nodes data is to resident.

Encrypted authentication tokens are exchanged in order to identify authorized Moderators, Technicians or system Administrators.

Participants and respondents are not required any information or data.

Participants and respondents are allowed into the sessions by invitation and by acceptance of the authorized personnel.

Upon request HT Face will be transmitted for backroom users.

All streams are transmitted to the closest available AWS Geo Node and then internally relayed to the designated processing Cloud Server. No data is required or collected in this transit.

Research features are also set by the booking owner.

### HT ANTON

HT Anton provides global mobile streaming from anywhere in the world to anywhere.

All streams are transmitted to the closest available AWS Geo Node and then internally relayed to the designated processing Cloud Server. No data is required or collected in this transit.

No local mobile data or video is stored for any amount of time.

Encrypted authentication tokens are exchanged in order to identify the user and the research that the user can stream.

Research is stored in the country of origin dictated by the scheduler and client settings.

Research features are also set by the booking owner.

### HT ARTHUR

HT Arthur provides local recording at the Facility, Conference, or its installation location. No internet if required for local processing.

All recordings are processed and stored locally.

Recordings are available and then automatically removed nightly or up to 7 days depending on the site SLA.

Each recording requires a name and no other information.

If Live Streaming is required, the facility representative would have to access the self-service online portal and book the live stream, and stream from the Arthur internal device at the desired time.

All locally stored facility media and data is also governed by the Facility GDPR compliancy and Facility's Information Security Classification and Handling Policy.

## **HT JACK**

HT Jack is a Mobile Ethnography, Video Diary, Online UX recording and streaming solution for desktop and mobile research.

Supports any platform, Mac, Windows Linux, iOS and Android.

There is no local recordings or metadata stored on the user's system

Encrypted authentication tokens are exchanged in order to identify the user and the research that the user can stream.

Research is stored in the country of origin dictated by the scheduler and client settings.

Research features are also set by the booking owner.

## **MEDIA AND DATA RULES AND FLOW**

### **Data storage and transfer**

If data is created within the EU, all data shall always be stored on our AWS server (location - Frankfurt) server in Germany. All media or data created in the UK, is stored in our AWS server (location - London). If the system IP location of the work carried out is outside the EU, the data shall be stored on the relevant server as per the information on page two above. All data/media created within the EU or UK shall be destroyed and removed from our online servers after a period of 30 days.

### **Audit and Inspections**

We commit and agree as the data processor to sharing all the available info to demonstrate our compliance with GDPR to our client (the data controller). The data controller is entitled at any time to engage an independent data security consultancy to carry out an audit or inspection on HT as a data processor. The data controller shall be liable for all charges associated with any audit or inspection.

### **GDPR Breach or Violation**

In the event of a GDPR breach or violation occurring including a security incident resulting in a breach of confidentiality, availability or integrity, and it is likely that the breach poses a risk to an individual's rights and freedoms, we shall endeavour to contact the data controller as soon as possible and no later than 72 hours after the breach occurs.

If the data breach poses a high risk to those individuals affected then they should all also be informed by the data controller, unless there are effective technical and organizational protection measures that have been put in place, or other measures that ensure that the risk is no longer likely to materialize.

### Termination of services


In the event of the termination of the services/ contract between the data controller and HT (the data processor), we shall ensure that all data held by us in relation to the data controller is destroyed in full. All access to HT media servers and global network shall be disconnected after termination of the contract. The HT Media server shall therefore be inoperable after termination of the contract.

### HT Online Booking form

All booking information and controls are available in one central location.

No Private Personal Information is collected in any part of the system. It is the booking and research owners' responsibility to ensure that all private data is retained within the guidelines.

The same booking form is used for all HT Products.



The screenshot shows a web form titled "Schedule" with the following sections:

- Schedule:** Start: Aug 28, 2018 01:21 PM, End: Aug 28, 2018 09:30 PM, UTC -1:00. A dropdown menu for "Site" is open, showing options: 08:30 PM, 09:00 PM, 09:30 PM (selected), 10:00 PM, 10:30 PM, 11:00 PM, 11:30 PM.
- Project Information:** Name, Description, Study (text input fields).
- Details:** Research (dropdown), Description (text input), Agency, Client (text input), Moderator (text input). Checkboxes: Blurred Video, Twokod Audio, Transcribe, Has Chat (checked), In Active (checked).
- Permission and Access:** Who Streams, Who Admins, Viewers, Moderators (dropdowns). Checkboxes: Download Video (checked), Download Audio, Send Invitations.
- Buttons: Cancel, Save.

## HOW DO WE GATHER CONSENT?

When someone is added to any part of the research, an email notification is sent out with full instructions and details of the privacy options.

Potential online viewers, participants, moderators, and other, are clearly informed of their privacy information and they have the choice to opt out and not to participate to the invited research.

See context below:

**“Privacy:**

**All our online services comply and adhere to all aspects of GDPR and TCPA privacy acts and we maintain all processes and procedures required to protect the privacy of respondents, online viewers, staff members for every study conducted.**

**Online Viewers:** We do not display, share or use any information that would enable the identification of any private individual. We provide you with the ability to assign yourself a nickname of your choice, as well as the registration information of your choice.

For security reasons, encrypted token cookies are being used to track your activity through the research so we can allow or block access and report usage back to content owner or coordinator.

Never share your online access credentials, it can compromise research security.

**Respondents:** We do not use, store or process any of the respondent's information. If you have any questions about the study please refer to the content owner for details and advise.

**Content:** All content stored and distributed by the online services is highly encrypted and stored in private secure storage devices. Content access is only granted to users that are approved by owner and/or study participants.

Content availability and permission is made based on the content owner's request, and if no such request is in place the system fallback on the strictest guidelines of GDPR and TCPA.”

Every research participant has a profile that is self-managed, and all information is willingly given and approved by the creator. The participating user can change this information at any time, see below.



### Edit your account profile

Please complete your profile by filling in the form entries.

**Nick Name**  
eyeViewer

**First Name**  
Private

**Last Name**  
Personal

**Phone Number**  
N/A

**Company**  
N/A

**Password:**  
[ Change your password ]

**Email**  
Guest@HT.net

**Nick Name**  
Demo Viewer

**First Name**  
Demo

**Last Name**  
Viewer

**Phone Number**  
NA

**Company**  
High Tech Development, LLC

**Active**  
True

**Roles**  
 Admin  User Admin  Scheduler  Project Admin  Developer

[Change Password](#)

## USER REMOVAL PROCESS

If at any point the participant wants to withdraw from the research or the system, we ask that the data controller (our direct client) shall send an email request to [Privacy@HighTech.Dev](mailto:Privacy@HighTech.Dev) This is sufficient to ensure that all the data related to the user will be removed. We will action such requests within GDPR mandated timeframes.

Once request is received the HT DPO will confirm the receipt, validate request and confirm removal of any user related information.

The HT global portal provides a streamed line process dedicated to deactivation and complete user removal.

## PRIVACY POLICY

High Tech Development (or the “Company”) is strongly committed to protecting your privacy and providing a safe online experience for all of our users. Because we gather certain types of information about and from users so that we can fulfill your requests and better serve your needs, we feel you should fully understand the terms and conditions surrounding the collection and use of this information. This privacy statement discloses what information we gather, how we use it, how to correct or change it, and what steps we take to safeguard personal information provided to us both online and offline.

We urge you to read the complete Privacy Policy below, as well as our Terms of Use, and contact us if you have any questions, but offer this short summary to highlight key points.

We collect personal and non-personal information from you to provide information and service and to conduct our business and may combine it with information we receive from third parties.

We may share personal and non-personal information about you with third parties in the circumstances described in this policy.

We use cookies, web beacons and other technologies to authenticate our registered users, and to provide certain functionalities.

We reserve the right to share information to satisfy a legal request, protect people or property, or in connection with a transfer of our business.

We adopt reasonable procedures to protect the personal information you send to us. However, we provide no guarantees that your data will always be secure.

The Company may, but is not obligated to, update this Privacy Policy from time to time. You should review this Privacy Policy periodically to familiarize yourself with the most current version. If we decide to change our Privacy Policy, we will post those changes to our Website so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. Material changes to this Privacy Policy will be posted on this Website 5 days prior to their becoming effective.

If you have questions or concerns regarding your privacy or this Privacy Policy, or wish to review and request changes to any information you may have previously provided, you should contact the Company at:

By Telephone: UK: +44 1625 836-307

By Email: [Privacy@HighTech.Dev](mailto:Privacy@HighTech.Dev)

## COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION

In the course of using the services of the Company, we may collect and maintain certain non-public personal information that will help us to efficiently perform various transactions. Your personal information may be entered into software systems maintained by our third-party application service providers for the purpose of allowing us to conduct our services. To the extent that your personal information is used in the foregoing manner, we will use commercially reasonable efforts to ensure that our service providers do not use your personal information for any purpose other than delivery of our services.

Our Website automatically collects certain information, such as your IP address, browser type, domain name, access times and referring website address.

We use your personally identifiable information for several purposes:

1. **Service/Account Communications:**

Whenever you register for one or more of the Company's services, we will use your personal information to provide our services to you, to provide you with service notifications, to respond to your service.

We may contact you regarding the status of your account, your registration information, support issues regarding our service, and changes to our service or the terms under which it is offered.

2. **Additionally, we may share your personally identifiable information in the following circumstances:**

We may disclose your personally identifiable information when required by law. Specifically, we may disclose this information to unrelated parties in special cases when we have reason to believe that our disclosure is necessary to identify, contact or bring legal action against a person or persons who may be causing injury to, or interference with, the rights or property of the Company (including our website), computer users accessing our website, or any third party. In addition, we may disclose information about individuals who access our website to law enforcement agencies, judicial or government authorities or to other individuals or entities in response to subpoenas, court orders or other legal processes.

In the event that the Company goes through a business transition, such as a merger, an acquisition by another company, or a sale of all or a portion of its assets, your and other users' personal information will, in most instances, be part of the assets transferred. If as a result of the business transition, your personal information will be used in a manner different from that stated at the time of collection, you will be given the option to continue sharing the information consistent with our notification of changes section. Nothing in this Privacy Policy is intended to interfere with the ability of the Company to transfer all or part of its business and/or assets (including the website) for any purposes, without limitation. The Company specifically reserves the right to transfer or share a copy of personally identifiable information collected from this website to the buyer of that portion of its business relating to that information.

If you are a registered user of the Company's services, we may retain your information as long as you maintain your registered status and thereafter in accordance with our customer or other business requirements.

### Links To/From Other Sites

Our Website may contain links to other Internet websites which we do not operate and, conversely, other Internet websites may contain links to our Website. We are not aware of and are not responsible for the privacy policies, practices

or content of such other websites. We encourage visitors to read and become familiar with the privacy policies maintained by such other websites.

### **Use of Cookies**

Your Web browser offers so-called "cookies" which, if you allow their use, store small amounts of data on your computer when you visit a website. Cookies do not contain any personally identifiable information about you and therefore cannot be used to identify you personally. Cookies allow us to authenticate our registered users and to assist us in tracking which of our Website pages you have viewed. You have the ability to accept or decline cookies by modifying your browser and our Website is viewable even if you disable the cookie function on your browser. However, if you disable cookies, you will not be able to access your account and some of our other services will not be available to you.

### **Do-Not Track-Signals**

Currently, (i) other parties (e.g. third-party advertising networks and analytics providers) may not collect personal information about your online activities over time and across different websites when you use our website or services, and (ii) we do not respond to, or take any specific action in connection with the receipt of, Do-Not-Track signals or other similar mechanisms regarding the collection of personally identifiable information about an individual's online activities over time and across third-party websites or online services.

### **Security**

High Tech Development uses industry standard efforts to safeguard the confidentiality of your personal identifiable information, such as data encryption, firewalls, system security measures and Secure Socket Layers (SSL). This means that any information you send us is protected by encryption. We transmit and store your personal information using SSL encryption. The registration pages, where you enter your personal information, are secure and are protected by the password you created when you registered on our Website. It is your obligation to protect the confidentiality of your password. If you lose control of your password, you may lose substantial control over your personally identifiable information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately change your password.

Notwithstanding the precautions that we take to safeguard your personal information in our system, you are advised that perfect security does not exist in commercial Internet applications and that such security measures may not prevent all loss, misuse or alteration of information on our Website. Therefore, although we work extremely hard to protect your privacy, we do not promise and you should not expect, that your personal information or private communications will always remain private.