
GDPR

Document History

Version	Report Prepared by	Date	Description
1.0	Consultant – Compliance Services	21/09/2020	Final Version
2.0	Consultant – Compliance Services	15/10/2020	Final Version

Contents

Background:

Tetherfi delivers rich-media, conversational, Multi-experience (MX) in-app customer engagement for Sales and Service. Tetherfi's in-app Multi-eXperience platform with the Tetherfi SDK / API enables enterprises deliver end-user capability to chat, touch, video, audio, screen share and co-browse with customer service personnel. Conducting all these multi-modal interaction within a single-session to resolve customer issues seamlessly is key in providing engaging customer experience (CX). Tetherfi provides services and solutions for multiple industries including BFSI, Telecom, Hospitality and Government.

Objective:

- To evaluate the conformance of the Tetherfi Remote Surveillance (TRS) platform as per the requirements of the GDPR.
- To provide actionable recommendations to fix the gaps identified and to conduct a final assessment of the TRS Application as per GDPR requirements.

Assessment Methodology:

- The assessment was conducted based on GDPR Guidelines.
- Comprehensive walkthrough of the application working.
- Comprehensive walkthrough of the Data Flow Diagram of the application.

Area Covered:

- Identify the privacy by design and other GDPR requirements applicability for TRS Applications such as Explicit consent Granular Opt-in, Named Parties, Data Subject Rights, etc.
- Explicit Content : Obtain active, affirmative, and explicit /implicit consent during the collection of personal data and maintain records of data subject's consent .
- Privacy Notice, Terms & Conditions: Provide a data privacy notice like a pop-up notification / embedded page or model window upon collecting personal data and consent from data subjects (customers/vendors and provide contact details of designated Data Protection Officer)
- Data Subject Rights : Implement Links/Mechanisms to obtain Data Subject request to access, rectify, right to erase and restrict processing of personal data.
- Easy to withdraw permission or Opt-out: The user should be able to withdraw their consent just as easily as it was to provide the consent.
- Identify gaps to be fixed by Tetherfi and recommend steps and initiative for Tetherfi' consideration.
- Develop Application GDPR Readiness Assessment Report as per the gap identified.

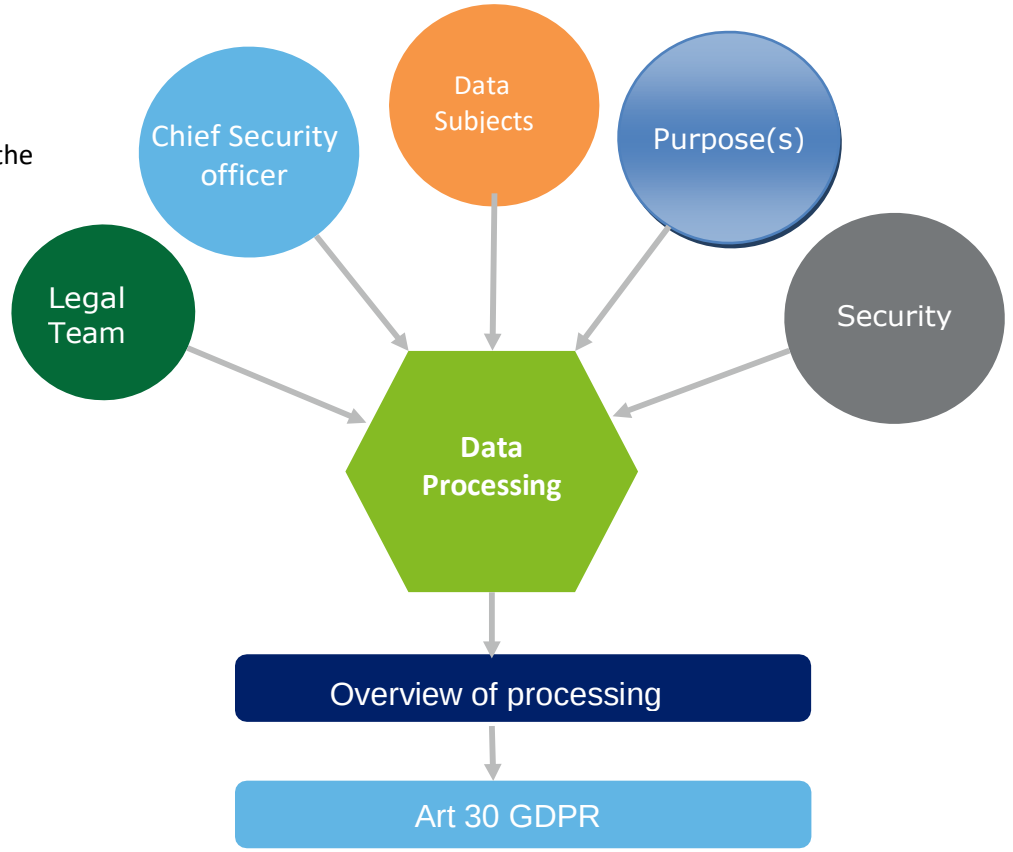
Organizational Perspectives:

TRS Introduction:

Tetherfi Remote Security (TRS) is an innovative solution that enables Enterprises to meet their security and compliance requirements for employees and agents working away from the secure environment of an office. TRS uses a laptop camera on an employee device to observe and verify the employee. Additionally, TRS provides a level of security for the remote work environment by monitoring for and raising violations when non-compliant activities are observed

Core Area:

TRS application is been designed with expertise of Chief Security Officer and Software developer by focusing the data security as per the requirement across in large scale and complex organizations



Data Processing:

Data Processing	
Lawfulness, fairness and transparency	Processed lawfully, fairly and in a transparent manner.
Purpose limitation	Collected for specified, explicit and legitimate purposes and not further Processed in an incompatible manner.
Data Minimization	Adequate, relevant and limited to what is necessary.
Accuracy	Kept accurate and up-to-date.
Integrity and confidentiality	Appropriate security ensuring protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage.

RISK Ratings Methodology:

Risk Category	Description
Compliant	Control Objectives being achieved
Partially Compliant	Control Objectives Partially achieved
Non-Compliant	Control Objectives not being achieved

TRS - GDPR Application Assessment:

Application Assessment	Controls	Audit Status- Compliant, Partially Compliant, Non Compliant
Application Data Security:		
Data Type (Client Employee PII)	The PII of an Employee like window session is recorded "active or end" session-, date time , and the domain is stored in DB	Compliant
How the Data is been Encrypted and Also at customer level	Data is been encrypted	Compliant
Are we maintaining the application Cookies, If yes then are we capturing the location, ip and country	No cookies are been captured except the office premises users- window session is recorded like "active or end" session- , date time-, and domain	Compliant
Portability on data transfer in secured and in readable format	1) OCM interface of the application has export option 2) Application shows that if users in office premises, access the phone then the volition entry is captured. The event details-, action summary, and session summary which is captured in office premises	Compliant
Application Usage Terms and Condition:		
Acceptance of Company Terms and Conditions and also privacy policy	1) User can see the pop up while accessing the application to read the privacy policy from the company website 2) Admin user or Chief Officer can push the privacy policy via an application	Compliant
Does the application inform the user that the screen contents are being recorded?	The application shows that before login to then application they get a pop-up of the company privacy policy	Compliant

TETHERFI-TRS-GDPR COMPLIANCE ASSESSMENT		
Company Privacy policy	This has been added to the Tetherfi website privacy policy	Compliant
How does the company update customers of changes to the application and policy	The application shows that the user will see the pop-up once there is a change in the privacy policy - in context to the Date & Time format	Compliant
Are users informed that their location would be tracked and the purpose of the same?	The admin user of application can enable or disable the function based on the requirement. This will be communicated to client in a legal contract to enable or disable the option. Moreover, how the data can be deleted and at what frequency shall be communicated to the employee	Compliant
Does the application give user the option to erase browsing history	User has the option to erase the data from the application	Compliant
Are there any checkboxes in the application which are checked by default?	No check box is by default checked. Only tabs incorporated in the application. On accepting the policy user will be able to re-directed to the application page	Compliant
Application security assessment to confirm that data captured in the application will be safe from a breach	Application security assessment conducted by an external third party agency and all findings has been closed	Compliant
TRS Application development policy which may be shared with our customer. ***Note*** *– The above application has been designed with the consent of the Chief Security Officer, Application designer, and Company legal advisor*		