

DATA PROTECTION COMPLIANCE



March 2023 | Version 1.1

Data protection law is at the forefront of many organisations' focus these days, with the recent introduction of the General Data Protection Regulation (GDPR) in Europe. In South Africa, there is the Protection of Personal Information Act which is a very similar law. Both laws have been introduced to protect people's personal data and privacy. We at **ESCROWSURE** want to comply with the law and have thought carefully about how to protect our clients' personal data. The following is a brief description of our view on the matter.

GDPR and POPIA are applicable to us; is your information at risk with us?

While our name might refer to Europe, **ESCROWSURE** is based in South Africa. This means that POPIA applies to us. We do however have clients situated in Europe, which requires us to also comply with the GDPR. This is because the GDPR is focused on protecting the personal data of natural persons who are European citizens within the EU. More than this, our business only deals with software and source code, which would not contain any personal data. Even if it does, we cannot access the data that you place in escrow.

In brief, we are not a data processor; we are a data controller, but with limited access to personal data. This data relates only to our juristic person clients, and the employee who represents them. This includes their name, company name, and contact information. We never collect any additional special personal data.

We have thoroughly investigated the impact of data protection law on our business, and even though we believe the level of risk to be very low, we are committed to taking our responsibilities seriously. Please read our Privacy Policy for more information on what data we collect, and what we do with it.