

Bold360 and the GDPR



On May 25, 2018, the European Commission will require all global organizations conducting business in the European Union (EU), as well as businesses maintaining or processing EU personal data, to comply with the General Data Protection Regulation (GDPR). These new rules aim to provide EU citizens with greater control over how their personal data is collected, stored, transferred and used, while also simplifying the regulatory environment across the EU.

Bold360's compliance with GDPR

As a global company with customers in nearly every country in the world, LogMeIn has always made it a priority to protect the personal data of our customers and their end users. GDPR represents an opportunity to continue our commitment in this area. LogMeIn (including Bold360) already participates in the EU-U.S. and Swiss Privacy Shield Frameworks and is compliant with current applicable EU data protection rules. At LogMeIn, our ongoing compliance review and actions build on our existing investments in privacy, security and the operational processes necessary to meet the applicable requirements of GDPR by May 25, 2018.

To make sure that customers understand LogMeIn's general philosophy towards GDPR, our goals by the date it will be enforced and how they may be able to use Bold360 in a GDPR-compliant way, it is important to remember a few points:

- In GDPR terminology, Bold360 is a "Data Processor" and you, our customer, are the "Data Controller" for all Customer Content (as defined in the [Terms of Service](#)). This means that you are in charge of determining the fate of all data uploaded and/or chats created by you or users on your account. Bold360 will comply with your instructions and the terms of any written agreement or contract as to how to deal with data (within the capabilities of the product).
- As Data Controller, you also own the relationship directly with users in your account – these users are considered to be "Data Subjects" under the GDPR. Data Subjects have certain rights under the law and Bold360 provides tools for you to assist Data Subjects in the exercise of their rights.
- For your privacy and security, we will delete your content (i) at your request, or (ii) after your account is no longer provided under a paid subscription.
- At any time, you have the right and the necessary tools to get your important content out of Bold360. We make it easy for you to maintain your own local backup copy.

It is very important to remember that by using Bold360, you are not necessarily or automatically fully GDPR compliant. We encourage you to verify that you meet all applicable aspects of the regulations and to seek legal advice, if needed.

Increasing your GDPR compliance with Bold360

As noted above, LogMeIn is well on its way to GDPR compliance and we believe that Bold360 may be able to assist customers in their efforts to meet GDPR's principles with the following:

- **Security:** To ensure comprehensive data protection in the cloud, data transmissions to and from Bold360 are encrypted using 256-bit SSL TLS 1.2. In addition, data at rest is encrypted with 256-bit AES. Bold360 operates on a hardened cloud infrastructure and conducts regular internal vulnerability assessments, as well as comprehensive external penetration tests annually.
- **Data minimization:** Enterprise admin controls may be deemed an acceptable data minimization practice. These controls allow a data controller to specify who has access to features, accounts and settings. In addition, admins can report on log-in activity and such functionality. Features such as automatic data obfuscation may help to minimize exposure to sensitive PII information from entering your Bold360 environment. This may help customers in limiting their data collection to information that is solely relevant and necessary for its intended use.
- **Data deletion:** Bold360 allows customers to export their content and delete certain collected information in the system. Further, data retention settings offer enterprise customers the option to automatically purge data on a periodic schedule. These features may allow a customer to meet requirements around deletion of personal data after its intended use is complete, consent is withdrawn or if a legitimate business purpose no longer exists.
- **Integrity:** With Bold360, all chats, visits and conversions can be validated to ensure they originate from the Data Controller's website along with correct parameterization.

Learn more about LogMeIn's GDPR compliance, including product-specific Security and Privacy Operational Controls (SPOCs), at logmeininc.com/gdpr.