

Proposer Details

Name of the Proposer: _____

Address: _____

Zip Code / City: _____

Telephone number: _____

E-Mail: _____

Website: _____

Founding Date: _____

Business Description: _____

Total Gross Revenue (in EUR):

Last year: _____ current year: _____ expected for next year: _____

Geographical Split of the Company's Total Gross Revenue:

	last year in %	current year in %
United States		
Switzerland		
European Union		
Rest of the World		

Data Protection Procedures

1. Is there a written data protection policy and privacy policy that applies to the Company?
Yes No

If "No", please provide details regarding data protection procedures for the Company:

2. Are all employees provided with a copy and any update of the Company's data protection policy which they are required to confirm compliance with?
Yes No

If "No", please explain why not:

3. When was the Company's data protection policy last reviewed and by whom?

4. Does the Company's data protection policy comply with the data protection and privacy legislation applicable to all jurisdiction and Industry standards/requirements, in which the Company operates?
Yes No

If "No", please provide an explanation regarding non-compliance in all applicable jurisdictions:

5. Have the Company's U.S. Subsidiary(ies) signed-up for, and are they compliant with, the Safe Harbor Program between the United States of America and the European Union?

Yes No

If "No", please provide an explanation regarding non-compliance with the Safe Harbor Program:

6. Does the Company employ a Chief Compliance Officer, Data Protection Officer and/or In-house Counsel responsible for data protection related matters?
Yes No

If "No", who is responsible for data protection related matters?

Data Access & Recovery

7. Does the Company use firewalls to prevent unauthorized access connections from external networks and computer systems to internal networks? Yes No

If "Yes", are all computer systems, mobile devices and websites Firewalled or have intrusion prevention systems on them?

8. Does the Company use anti-virus protections and procedures on all desktops, e-mail systems and mission critical servers to protect against viruses, worms, spyware and other malware?

Yes No

If "Yes," how often are such protections and procedures updated:

Daily Weekly Monthly Other (please specify) _____

9. Does the Company have in place procedures to identify and detect network security weaknesses? Yes No

10. Does the Company monitor its network and computer systems for Breaches of Data Security? Yes No

11. Does the company have physical security controls in place to prohibit and detect unauthorized access to their computer system and data centre? Yes No

12. Does the Company collect, store, maintain or distribute credit card or other sensitive personally identifiable data? Yes No

Credit Card

Personally identifiable data

If "Credit Card" is selected above, does the company comply with Payment Card Industry Data Security Standards? Yes No

If either is selected above, is the access to such sensitive data restricted?

Yes No

If "Yes," who has access? _____

13. Does the Company process payments on behalf of others, including eCommerce transactions? Yes No

If "Yes", please provide the number of clients you process such payments for and an estimated number of transactions per client:

14. Does the Company have encryption requirements for data-in-transit data-at-rest to protect the integrity of Sensitive Data including data on portable media (e.g., laptops, DVD backup tapes, disk drives, USB devices, etc.)? Yes No

If "Yes", please describe where such encryption is used:

15. Does the Company have and maintain backup and recovery procedures for all:

i) Mission critical systems? Yes No

ii) Data and information assets? Yes No

If "Yes", is it encrypted?: _____

16. Does the Company regularly test the ability to restore data (at least every six [6] month)?

Yes No

17. Does the Company perform background checks on all employees and independent consultants? Yes No

18. Does the Company require remote users to be authenticated before being allowed to connect to internal networks and computer systems? Yes No

Outsourcing Activities

19. Does the Company outsource any part of its network, computer system or information security functions? Yes No

If "Yes", who is the security outsourced to? And does the Applicant periodically audit the functions of the outsourcer to insure that they follow the Applicant's security policies?:

20. Does the Company outsource any data collection and/or data processing? Yes No

If "Yes", please provide details of the data collection or data processing functions which are outsourced:

21. Does the Company require the entities providing data collection or data processing functions (Outsourcers) to maintain their own data protection liability insurance? Yes No

22. Does the Company require indemnification from Outsourcers for any liability attributable to them? Yes No

23. How does the Company select and manage Outsourcers?

24. Does the Company require all Outsourcers to comply with the terms of the Company's data protection policy? Yes No

Claims Information

25. Has the Company been the subject of any investigation or audit in relation to data protection by a Data Protection Authority or other regulator? Yes No

If "Yes", please provide full details:

26. Has the Company ever been subject to a Data Subject Access Request?

Yes No

If "Yes", please provide full details:

27. Has the Company ever been subject to an Enforcement Notice by a Data Protection Authority or any other regulator? Yes No

If "Yes", please provide full details:

28. Is the Company after due inquiry aware of any actual or alleged fact or circumstance which may give rise to a claim under this policy? Yes No

Signature _____

Name _____

Title/Function _____

Date _____