

MANGOAPPS GDPR GUIDE

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What is GDPR?

The EU General Data Protection Regulation (“GDPR”) is a new comprehensive data protection law that updates existing EU laws to strengthen the protection of “personal data” (any information relating to an identified or identifiable natural person, so called “data subjects”).

If you are processing personal data in the context of an organization established in the EU, the GDPR will apply to you, regardless of whether you are processing personal data in the EU or not. “Processing” means any operation performed on personal data, such as collection, storage, transfer, dissemination or erasure. If you are not established in the EU, the GDPR applies to you if you are offering goods or services (whether paid or free) to EU data subjects or monitoring the behaviour of EU data subjects within the EU. Monitoring can be anything from putting cookies on a website to tracking the browsing behaviour of data subjects to high tech surveillance activities.

Under European data protection law, organizations processing personal data are divided into “Controllers”, the entities which control the personal data, and “Processors”, the entities that process personal data only on the instructions of the Controllers. The GDPR applies to both Controllers and Processors.

MangoApps Commitment to GDPR

Since our inception, MangoApps approach has been anchored with a strong commitment to privacy, security, compliance and transparency. Similar to existing privacy laws, compliance with the GDPR requires a partnership between MangoApps and our customers in their use of our services. We have analyzed the requirements of the GDPR, and have made enhancements to our products and processes to support compliance with this regulation.

To further earn our customers’ trust, we have a Data Processing Addendum (“DPA”) for our customers with contractual commitments regarding our compliance with the provisions required by the GDPR. Our commitment guarantees that customers can:

- Respond to requests from data subjects to correct, amend or delete personal data.
- Be made aware of and report personal data breaches to relevant supervisory authorities and data subjects in accordance with GDPR timeframes.
- Demonstrate their compliance with the GDPR as pertaining to MangoApps Services

To support our customers with their efforts to be GDPR compliant please refer to our list in the “More Resources” section below. We continue to add product features that assist our customers with their privacy & data protection rights when using our services.

MangoApps GDPR Readiness

MangoApps has a proven history of over 10 years of ensuring data privacy and trust of our customers. This trust and commitment has continued in our journey to be GDPR ready. Here are some of the key steps done to be ready for GDPR and other privacy & data protection regulations

1. **MangoApps is hosted on AWS cloud:**

MangoApps utilizes 100's of security & compliance features of AWS to maintain the highest-level data security and protection requirements. Some of the key ones include

- Access Control: Access to only authorized admins allowed using multi-factor authentication (MFA) and fine granular access to different AWS services
- Monitoring & Logging: Asset management and configuration with AWS Config along with compliance auditing using AWS CloudTrail
- Encryption: Encryption of data at rest with AES256, centralized key management (by AWS region) and IPsec tunnels into AWS

2. **MangoApps Product Security & Compliance Features:**

With ongoing product innovation, we have added features and functionality to the MangoApps platform and it's now ready to support customers with their GDPR compliance programs. Using MangoApps advanced security & compliance features, customers can implement their compliance program covering transparency, accountability, data access, data portability, data rectification, right to be forgotten, restriction to processing etc. of the GDPR requirements. Additionally, MangoApps comes in-built with disaster recovery & encryption features for all our customers' data.

3. **MangoApps Organization Controls & Processes Upgrade:**

MangoApps security team regularly reviews and measures it's technical and organizational controls & processes along with its compliance policies to ensure that they are robust and up to date. This includes:

- Patch Management: Latest security patches applied for OS and applications on a regular basis and a record maintained.
- Configuration Management: Configuration review of AWS EC2, RDS and other AWS services regularly done
- Network & Firewall Configuration: MangoApps uses the AWS VPC advanced security features including security groups and network access control lists, with inbound and outbound filtering. Additionally, the most restrictive access is configured to AWS S3 where customer files are encrypted and stored at rest
- Awareness & Training: Data protection & privacy training for employees is regularly done

4. **HIPAA Compliance Ready:** MangoApps comes with the ability to configure it for Health Insurance Portability and Accountability Act ("HIPAA")

GDPR Requirements & Actions

Below are the features and functionality available in the MangoApps products that support GDPR compliance. Here we've clarified key GDPR requirements by grouping them into two different action categories: "Customer" and "Shared". Customer actions are requirements that only the customers of MangoApps can perform, shared actions are those that need to be performed by both MangoApps and the customers of MangoApps.

GDPR Requirement	Actions	How MangoApps helps address the requirement? *
1. Consent	Customer	Through its platform, MangoApps enables users to control and share the content they want to in MangoApps. Customers should identify the information they put in MangoApps and confirm that data subject's consent has been obtained on it. MangoApps provides customers with features like the "Terms of Service", "Usage Policy" and "Startup" dialogs/pages to get the informed consent of their users. The startup dialog can further be configured to take the user's consent whenever there is a change in privacy policy that requires the consent again from the data subject.
2. Transparency	Shared	MangoApps: The MangoApps platform is designed to provide users with full control of their content and how it's accessed. MangoApps takes several measures to provide customers with transparency around how their personal data is managed: <ul style="list-style-type: none"> i. Privacy Notice: MangoApps privacy notice is easily accessible on the company's website and communicates our privacy practice. MangoApps also offers ways for customers to communicate directly with the MangoApps team regarding their data protection and other privacy-related issues.

		<p>ii. Terms of Service: MangoApps provides an enhanced level of transparency with the easily accessible terms of service document on the company's website.</p> <p>iii. Release Notes: Through the MangoApps online release notes, customers can see what major feature changes and product releases are coming out. This provides a clear and accessible way for customers to know about new features and functionality to help them manage their content in MangoApps.</p> <p>Customer: Through the MangoApps platform, customers can control how content is organized, managed and accessed. Customers can grant or deny access to their MangoApps account and content, which means customers control who can and cannot access their content. Customers are responsible for providing an appropriate level of transparency regarding the personal data of the data subjects they manage through the MangoApps platform.</p>
3. Data Protection by Design	Shared	<p>MangoApps: MangoApps is responsible for developing and delivering the platform and how content is processed by the platform. MangoApps makes efforts to instill privacy by design throughout MangoApps as an organization, through internal privacy by design training and internal privacy reviews and assessments. To demonstrate even a greater deal of security MangoApps platform comes with features like two-factor authentication(2FA), complexity of passwords, Touch ID on mobile devices, custom IP ranges to limit access, disable and wipe out data remotely on mobile & desktop apps, un-authorized access auto-notifications, change of access location auto-</p>

		<p>notification and auto-deletion/self-destruct capabilities.</p> <p>Customer: Users are responsible for how content is managed through the MangoApps platform. Organizations should periodically review their use and configuration of the MangoApps platform to validate data protection has been considered by design. Refer the list of items in the “More resources” section below for additional guidance.</p>
4. Data Protection Impact Assessment	Customer	<p>If required by the GDPR, customers may need to appoint a data protection officer to ensure their compliance with the GDPR. MangoApps does not offer data protection officer services.</p>
5. Data Encryption	Shared	<p>MangoApps: All content posted in MangoApps is over HTTPS and is encrypted at rest using AES 256-bit encryption.</p> <p>Customer: Customers are responsible for ensuring MangoApps native encryption meets their requirements. To demonstrate an even greater degree of security, MangoApps allows companies to configure their own file storage account and even signup for single-tenant/private cloud offering for higher data privacy.</p>
6. Data Rectification	Customer	<p>Through its platform, MangoApps allow data subjects to have access to their profiles to amend inaccuracies, make edits to content they have posted, delete content they have posted and upload newer versions of document they have uploaded.</p>

7. Data Portability	Shared	<p>MangoApps: Through its platform, MangoApps provides customers right to export their personal data using export of network feature. Uploaded files can be exported using the desktop app file sync and using download of folder feature. Inferred and derived personal data (e.g., engagement score, badges) are not included because they are not “provided by the data subject”.</p> <p>Customer: Using the various data export options customer can export the personal data in machine-readable format. Here are some of the methods customers have available to them:</p> <ul style="list-style-type: none"> i. Export of network data ii. Export of team data iii. Export of users iii. Export of calendar data iv. Export of files data
8. Data Inventory	Customer	<p>Through the MangoApps platform, MangoApps enables users to control what content is shared & stored in MangoApps. Customers are responsible for maintaining an inventory of the personal data stored in the MangoApps platform and can leverage a variety of techniques to help manage it. This includes user profile custom fields, designating specific wikis, designating specific folders, files and assigning hashtags</p>
9. Subject Access Requests	Customer	<p>MangoApps provides multiple ways to customers wanting to access the personal data of users stored in MangoApps. While customers need to define their own policies and processes to fulfil a data subject access request, MangoApps provides several methods to access and export personal data except for data that can't be associated with a user (e.g., anonymous surveys) Furthermore the data subject</p>

		<p>request should not adversely affect an organization's intellectual property (i.e., giving access to a data subject should not require disclosure of trade secrets). Here are some of the methods customers have available to them:</p> <ul style="list-style-type: none"> i. Log exports: Customers can export logs through their domain admin portal ii. Open APIs: Customers can access their data using open APIs from MangoApps iii. Third-party integrations: Customers can quickly view and manage all their third-party integrations through the domain admin interface and settings iv. Files download: Every file stored in MangoApps can be easily downloaded using download files & download folder features iv. File Sync: Files can be accessed/exported using the desktop & mac file sync feature v. Search: Users can use the search full network feature to access & find the content stored in MangoApps
10. Right to be Forgotten	Shared	<p>MangoApps: MangoApps provides a feature for teams ownership to be transferred from a user to another. To permanently delete a user and have all the content posted by the data subject permanently deleted have the authorized domain admin of the company write to support@mangoapps.com and MangoApps will perform the action.</p> <p>Customer: Users can any delete content that they have posted at any time. Additionally, customers are in control of the content stored in their instance of the MangoApps platform. This includes setting the appropriate timelines in MangoApps to manage the retention of their</p>

		<p>content and setting the trashcan retention settings. Based on the parameters set by customers, MangoApps will retain content in the customer trash can accordingly before they begin to be processed for deletion. MangoApps retention and trash settings are not applicable to content outside of a customer's MangoApps instance or if customer's content is processed in another system. Customers have control over the profile user fields to store, the option to set fine-grained control over content retention, configure delete/self-destruct settings and quarantine files with viruses. Finally, users have control over deleting the content they have posted and remove information about themselves from their profile as setup by their company admins.</p>
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*Since these key requirements are just a subset of the GDPR, please ensure your internal teams review all the GDPR requirements so you maintain compliance. This is not intended as legal advice and customers must seek appropriate legal advice to ensure their implementation of the requirements is in accordance with the GDPR.

More Resources

We're dedicated to evaluating and meeting the highest bar for data privacy globally and that means developing features and capabilities to ensure our customers world-over meet data privacy obligations. Here is a list of some more resources to help you on your GDPR journey with MangoApps

- [Terms of Service](#) and [Privacy Policy](#)
- [Privacy & Security Layers & FAQs](#)
- [Security & Compliance Features](#)
- [Audit Logging & Un-Authorized Access Notifications](#)
- [Data Export Feature](#)
- [Multiple Secure Deployment Choices](#)