

# TINYTAKE GDPR GUIDE (BY MANGOAPPS)

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# What is GDPR?

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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

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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

We continue to add product features that assist our customers with their privacy & data protection rights when using our services.

# TinyTake GDPR Readiness

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TinyTake has a proven history 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. **TinyTake is hosted on AWS cloud:**

TinyTake 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. **TinyTake Security Features:**

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

## 3. **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: TinyTake 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

# GDPR Requirements & Actions

Below are the features and functionality available in TinyTake that supports 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 TinyTake (By MangoApps) helps address the requirement? *
1. Transparency	Shared	<p><b>TinyTake:</b> The TinyTake platform is designed to provide users with full control of their content and how it's accessed. TinyTake (By MangoApps) takes several measures to provide customers with transparency around how their personal data is managed:</p> <ul style="list-style-type: none"> <li>i. <a href="#">Privacy Notice</a>: TinyTake privacy notice is easily accessible on the company's website and communicates our privacy practice. TinyTake also offers ways for customers to communicate directly with the TinyTake team regarding their data protection and other privacy-related issues.</li> <li>ii. <a href="#">Terms of Service</a>: TinyTake provides an enhanced level of transparency with the easily accessible terms of service document on the company's website.</li> </ul> <p><b>Customer:</b> Through the TinyTake platform, customers can control how their content is accessed. Customers can share the files, videos, images with public by uploading to the cloud or keep them private by saving it locally on their PC.</p>
2. Data Protection by Design	Shared	<p><b>TinyTake:</b> TinyTake is responsible for developing and delivering the platform and how</p>

		<p>content is processed by the platform. TinyTake makes efforts to instill privacy by design throughout the organization, through internal privacy by design training and internal privacy reviews and assessments.</p> <p><b>Customer:</b> Users are responsible for how content is shared through the TinyTake platform.</p>
3. 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. TinyTake does not offer data protection officer services.</p>
4. Data Encryption	Shared	<p><b>TinyTake:</b> All content posted in TinyTake is over HTTPS and is encrypted at rest using AES 256-bit encryption.</p> <p><b>Customer:</b> Customers are responsible for ensuring TinyTake native encryption meets their requirements.</p>
5. Data Rectification	Customer	<p>Through its platform, TinyTake allow data subjects to have access to their profiles to amend inaccuracies and delete content they have posted.</p>
6. Right to be Forgotten	Shared	<p><b>TinyTake:</b> TinyTake provides a feature to permanently cancel your account. This sends a request to TinyTake team which deletes your account permanently. Deleting your account will delete permanently all your profile information (e.g., email address) and all the files you have uploaded to tinytake.</p> <p><b>Customer:</b> User need to request cancellation of their account</p>

\*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

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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 TinyTake

- [Terms of Service](#) and [Privacy Policy](#)
- [TinyTake Help](#)