



VTX and the GDPR, the new European regulation on data protection.

VTX is committed to protect the personal data of its customers and partners, and is committed to comply with the new General Data Protection Regulation (GDPR) which is enforced throughout the European Union from May 25th, 2018.

This new regulation can be found [here](#).

➤ Context

The new Data Protection Regulation (GDPR) will become effective on May 25th 2018 throughout the European Union (EU). From this date, the GDPR will be directly applicable to all actors active on the territory of the European Union. The new rules consist of giving citizens more control over their personal data, increasing corporate accountability while reducing their declaration efforts and strengthening the role of the authorities regarding the data protection. This text will have a direct impact on a large number of Swiss companies.

➤ When does the new regulation apply ?

The new GDPR regulation will become effective from May 25th.

➤ Who is concerned by the GDPR ?

The GDPR concerns all companies operating in the EU. However, companies located in Switzerland and in other 3rd party countries may also be impacted.

Please note that only "personal" data are covered by the GDPR (article 4 GDPR).

➤ What is a personal data?

The data are considered "personal" thenceforward they concern physical persons identified directly or indirectly. A person is identified for example when his name appears in a file.

Data that we may consider anonymous may be personal data if it is used to indirectly identify or cross-refer information to a specific individual. It may in fact be information that is not associated with a person's name but which allows easy identification and knowledge of one's habits or tastes (source: National Commission for Information technology and Civil Liberties (CNIL)).

➤ Is the VTX group subject to the GDPR?

Yes, but indirectly only :

- no targeting or processing based on personal data;
- no specific targeting of customers or prospects from the European community;
- an activity that takes place on Swiss territory and the guarantee of location of our servers and datacenters strictly in Switzerland and in no way in the EU;
- VTX does not have any access to its customers' data who have racks or websites hosted in its datacenters;
- no data transfer to partners, whether in Switzerland or in the EU;- end-to-end control of the data management chain.

However, for some of its services (eg hosting, housing, domain name, Smart Numbers), VTX may have EU customers, or may have personal data of EU natural persons having a professional activity in a Swiss company. For these cases or any other case involving personal data of EU citizens, VTX is subject to this new European regulation and undertakes to respect its obligations.

➤ Which data are usually collected by VTX ?

We collect the data that our customers provide to us when establishing the original contract, as well as the relevant data provided in their contacts with VTX's commercial or technical departments. VTX does not collect personal data related to the consumption of its Swiss or EU customers beyond the telephone information required to bill its services.



► Is VTX targeting?

VTX does not make any personal database targeting or based on VTX consumer usage behaviours; VTX does not exploit the personal data of its customers and, therefore, is not impacted by art. 3 of the GDPR.

► What are VTX's commitments to its customers?

Art. 24

VTX is committed to perform a rigorous follow-up of its employees who have access to the main databases that contain the personal data of its customers, and will ensure that all its employees in contact with personal data, have the knowledge requirements of the GDPR and VTX commitments in this area.

Art. 25

VTX is committed to generate systematic encryption of the portal access systems of its customers as soon as their profile is created.

Art. 27

VTX is committed to closely follow security and integrity of its customers' personal data, and will strive to respond to all queries and requests for information from its customers within a period of time according to the Swiss and European regulations. For all requests from its customers, Frédéric Fischlin, Chief Service & Operating Officer of the VTX Group, will be the person in charge of the coordination of these requests and responses.

Art 30

As VTX has not reached the critical number of 250 employees, it is not obliged to maintain a register according to paragraph 1 of Article 30.

Art 32

VTX is committed to make every effort to ensure optimal security of its facilities and continuously optimizes the protection of its customers' personal data and their integrity by HW and SW upgrades according to the requirements of our technical suppliers.

VTX is committed to proactively communicate with its employees, highlight VTX's commitments to customers, ensure that VTX employees' behaviours are aligned with VTX's values and of the new RGPD regulation on the protection of personal data. A very low turnover of our staff also guarantees this security and integrity.

Art. 40 and 41

VTX is a company focused on formation and training, and dedicated for many years to maintain a professional and high values in the commitment and respect of its customers. VTX issued a code of conduct in its regulations in the 2000s, and this code of conduct is applied systematically for all its employees, apprentices and trainees.

► Conclusions

VTX is not directly affected by the new GDPR law on EU data protection, but do its best to respond to all its clients impacted directly or indirectly by one or more articles of law. VTX is committed to make every effort to meet the demands and requests of its current and future customers under the new EU GDPR regulations that come into effect on May 25th 2018.