Dropbox's GDPR Compliance Journey



Introduction

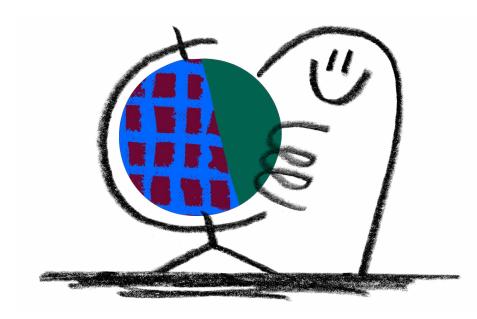
Europe's General Data Protection Regulation (GDPR), a European Union regulation that updates and harmonises the framework for processing personal data in the EU, comes into effect on May 25, 2018.

As this important date draws near, our customers are increasingly focused on the real-world implications of the new European data protection framework.

At Dropbox, we are also preparing for the GDPR. Based on customer feedback, we know you may be curious about these preparations. We've decided to share a bit of our journey with you.

What the GDPR means to Dropbox

Trust is the foundation of our relationship with millions of people and businesses around the world. We value the confidence you've put in us and take the responsibility of protecting your information seriously.

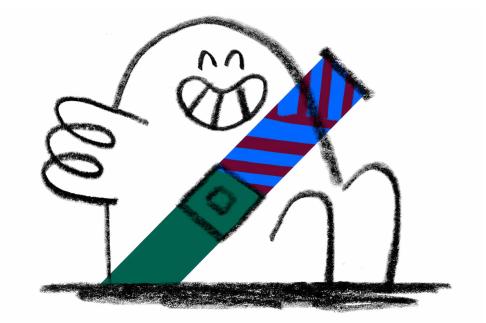


At Dropbox, the **security and privacy of your data are our highest priorities**:

- We have a dedicated security team using specialist tools and engineering practices available to build and maintain Dropbox, and we've implemented multiple levels of security to protect and back up your files.
- Our security practices comply with the most widely accepted standards and regulations like ISO 27001, 27017, 27018 and SOC 1, 2, and 3. Independent third-party auditors test our controls and provide their reports and opinions.
- More information on the standards that we comply with and how we verify our security practices is available on our <u>compliance</u> web page.
- Our <u>Dropbox Business Security White Paper</u> sets out in detail all aspects of our approach to security (infrastructure, network, application, physical, information etc.).

We have a **strong track record on data protection**:

- Dropbox places the utmost importance on data protection and has a track record of staying ahead of the compliance curve for example, we were <u>one of the first</u> cloud service providers to achieve ISO 27018 — the internationally recognised standard for leading practices in cloud privacy and data protection.
- We have dedicated privacy experts designing and maintaining our privacy program and policies to help safeguard your data in line with the requirements of the GDPR.
- Dropbox includes strong contractual commitments in its agreements with our business customers. Our business customer agreements incorporate the EU model contract clauses and we are certified under the EU-U.S. Privacy Shield Framework. This means there are additional legal protections and external monitoring regarding the collection, use, and retention of personal data transferred from the European Union to the United States.



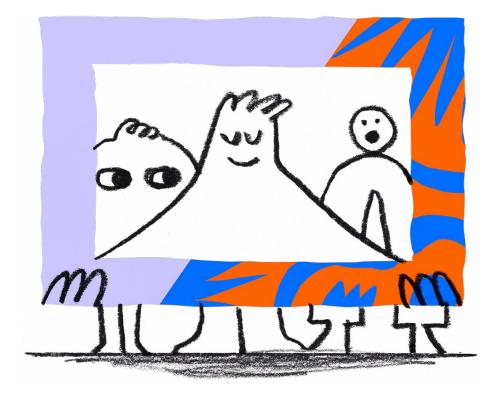
How Dropbox is getting ready

Given this strong foundation, Dropbox views reaching GDPR compliance as an incremental build on top of our existing practices and controls, rather than a revolution in the way we process personal data. We are already well positioned to meet many of the obligations of the GDPR and are well on the way to full compliance in advance of May, 25 2018. (Our commitment to full compliance in advance of the deadline is published in this help centre piece).

Dropbox's journey to compliance began as soon as the regulation was adopted in 2016. Our first step was to **form a crossfunctional team of data protection specialists** consisting of legal counsel, security and compliance professionals, product and infrastructure engineers, from both sides of the Atlantic to specifically analyse and address the new requirements of GDPR. The next step was to **evaluate our current security and data protection practices and GDPR readiness levels**. This involved performing a complete and detailed gap assessment of the GDPR and most recent accompanying guidance, determining what areas were applicable to Dropbox, and then assessing if our current practices either met the requirements as described or needed iteration in order to fully meet the requirements.

Our next step was to **perform a complete and detailed evaluation of our personal data processing activities**. This exercise is sometimes referred to as "Data Mapping". In effect, this data mapping traces the lifecycle of personal data through our systems, from initial collection from the user all the way to deletion and disposal. We are **building on our existing internal processes and procedures** to ensure we meet the accountability principles under the GDPR requirements. This is important as the GDPR places an increased focus on documenting decisions and practices affecting personal data.

With our expert team well established, a full GDPR gap assessment and data mapping completed, Dropbox has been busy implementing steps and process developments to ensure we can comply fully with GDPR by May 2018. Given our existing strong foundations in data protection and security practices, we are confident of completing these incremental changes necessary to reach full compliance.



How Dropbox can help you prepare

Dropbox is also committed to helping our customers prepare for their obligations under the GDPR. We will be publishing guidance and tips for how customers can leverage Dropbox in their own GDPR compliance journeys soon.

Check back in on the **Dropbox Business Blog** for more insights on GDPR as they are published.

