

Introduction

Welcome to the AgileOne's privacy notice according to Art. 13 GDPR.

AgileOne respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how AgileOne collects and processes your personal data through your use of this website, including any data you may provide through this website when you complete the contact form.

The notice also provides some general information on how AgileOne Group might collect and process personal data in other situations.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

ACT1 Group, Inc. dba AgileOne is the controller and responsible for your personal data collected and processed through your use of this website.

The AgileOne Group including European operations is made up of different legal entities as set out in the Glossary, contact details of which can be found here [LINK TO CONTACT DETAILS OF EU AFFILIATES ON AGILE-ONE.COM](#).

The general non-website related information in this privacy notice is also issued on behalf of the AgileOne Group so when we mention "AgileOne", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the AgileOne Group responsible for processing your data.

Although this website provides information and contact details of the other legal entities in the AgileOne Group, ACT1 Group, Inc. dba AgileOne is the controller of and responsible for this website.

We have appointed a Head of Privacy to oversee GDPR compliance of the AgileOne Group and to act as data protection officer (DPO). The Head of Privacy is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice please contact the DPO using the details set out below.

Contact details

Our full details are:

- ACT1 Group, Inc. dba AgileOne
- Postal address: 1999 West 190th Street, Torrance, California 90504, USA
- DPO: Nicholas L. Wills, Assistant General Counsel and Head of Privacy
- Email address: privacy@agile1.com

ACT1 Group, Inc. dba AgileOne is represented in the EU by [ACT*1 Services Limited t/a AgileOne in the United Kingdom](#). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 1 June 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

This website also contains links to the AgileOne DriveSRM portal and the People Portal.

The information in this Privacy Notice specific to the website does not apply to those services.

Should you use DriveSRM portal and the People Portal you will receive a separate privacy notice from the appropriate controller which may be a customer of AgileOne.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed and cannot be determined by reference to other sources (anonymous data).

Information collected through your use of this website is:

Website: IP Addresses and Cookies:

Your IP address is collected and stored by third parties so that AgileOne can analyse website traffic data. The IP address data is not expressly identifying and would require matching to data not held by AgileOne in order to identify you.

When you complete the contact form your IP address and cookies are collected. The cookie data stored is a hashed id that aligns to the user information that was entered into the forms. When you re-enter the contact form it prepopulates with data that you had submitted previously.

Website: Contact Form

The website contact form is there if you wish to submit a contact request. The personal data submitted are:

- First and last name
- Company details
- Reason for inquiry
- Phone number
- Email
- Message
- Location (EU/non-EU)

If you submit a contact request we will also log whether you have read this privacy notice or not.

The contact form information will be used to assess your contact query and respond to you accordingly. The query will be sent to the relevant department within AgileOne and someone will get back to you using the contact information you provided. Cookie and IP addresses will also be associated with the request so that the form can be re-populated.

General: AgileOne Business Activities:

Where we act as a controller we may collect, use, store, and transfer different kinds of personal data about you during our wider business activities which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth, gender.
- **Employment Data** includes recruitment information, employee-related data.

- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments and other details of our services you may have directly or indirectly used.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, orders submitted by you, timesheet information, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about individuals other than our employees and prospective employees (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences other than in relation employees and prospective employees.

If you fail to provide personal data

Where we need to collect personal data by law, or in relation to a contract that you are a party to and you fail to provide that data when requested, we may not be able to support the contract. In this case, we may have to cancel a relevant service you have with us but we will notify you if this is the case at the time.

Use of the website is not dependent on the provision of personal data. If you disable cookies we apply then the contact form might not re-populate. If you do not provide the contact form data then we will not be able to provide you with further information about our services.

3. How is your personal data collected?

Website:

As a website visitor your data are collected by direct interaction with you via the contact form, and by the automatic interactions between our website and your equipment. We may also obtain technical information about you from third parties such as Pardot and Google Analytics.

General: AgileOne Business Activities

In other non-website situations we use different methods to collect data, where this is the case, data subjects will be informed in advance or as soon as practicable after the data is collected. Please note that a lot of our data processing is in the discharge of our services to customers as a data processor of those customers, in such cases we are not always controller of the personal data and our customers will be responsible for providing information about data processing to the data subjects. The following are non-exclusive examples of how we collect personal data.

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, business card, or otherwise. This includes personal data you provide when you:
 - use our services;
 - create an account on our web-based technology;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - provide feedback.
- **Staffing Vendors and Customers:** Under our MSP programmes both customers and staffing vendors and contingent workers directly input personal data into our web based technology and we process that data on behalf of our customers.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. The details are already mentioned above.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below **DELETE OR ADD TO THIS LIST AS APPROPRIATE:**
 - Technical Data from the following parties:
 - (a) analytics providers such as Google, based inside or outside the EU;
 - (b) advertising networks based inside **OR** outside the EU; and
 - (c) search information providers such as Google based inside **OR** outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside **OR** outside the EU.
 - Identity and Contact Data from data brokers or aggregators based inside **OR** outside the EU.
 - Identity and Contact Data from publicly available sources.

4. How we use your personal data

We will only use your personal data when the law allows us to in the operation of our business. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data collected through or in relation to this website, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

If we use your personal data in other circumstances and we are the controller, you will be notified by us accordingly. If we process your data for a customer then the customer will send you the relevant notice.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To fulfil your contact form request	<ul style="list-style-type: none"> • First and last name • Company details • Reason for inquiry • Phone number • Email • Message • Location (EU/non-EU) 	(a) Necessary for our legitimate interests (promoting and supporting our business and services and answering queries)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a privacy centre where you can view and make certain decisions about your personal data use [PRIVACY CENTRE LINK](#) **OR** the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the AgileOne group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. We will keep a limited amount of your personal data on a suppression list to ensure that your request to opt-out of marketing is properly honoured.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies the contact form might not re-populate when you visit.

In non-website related situations where users interact with our web-based technology, AgileOne may use cookies to facilitate your internet sessions, maintain security and to improve our websites. For example, AgileOne uses cookies to verify your identity and monitor your use of AgileOne websites to improve our services. If you choose not to enable cookies on your browser, you may not be able to use all of the services offered on AgileOne's web-based services.

Find out more link to text box below

We use cookies and/or other similar technologies, such as tracking GIFs, web beacons pixel codes and in-app IDs, either alone or in combination with each other to create a unique device ID.

We use the following types of cookies:

- **Strictly necessary** cookies. These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance** cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality** cookies. These are used to recognise you when you return to our website. This enables us, subject to your choices and preferences, to personalise our content, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting/Advertising** cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information subject to your choices and preferences to make our website and the advertising displayed on it more relevant to your interests. **We may also share this information with third parties for this purpose.**

We may also work with advertising networks that gather information about the content on our website you visit and on information on other websites and services you visit. This may result in you seeing advertisements on or through our website or our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off see below or visit <http://optout.networkadvertising.org/#/>

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our website. If you disable all cookies, you will be unable to complete forms on our website.

If you want to disable cookies on our website, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below: -

For Microsoft Internet Explorer:

1. Choose the menu “tools” then “Internet Options”
2. Click on the “privacy” tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced

2. Under "Privacy and security," click "Content settings".

3. Click "Cookies"

For Safari:

1. Choose Preferences > Privacy

2. Click on "Remove all Website Data"

For Mozilla firefox:

1. Choose the menu "tools" then "Options"

2. Click on the icon "privacy"

3. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files"> "Preferences"

2. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

Except for essential cookies, all cookies used on our site will expire after two years.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

This website is hosted in the USA. By interacting with our website and entering information in the contact form your information is collected directly in the USA. Your data may be shared with the AgileOne Group in the EEA in order to fulfil your contact request.

Where an EEA AgileOne Group entity collects your data it may be shared within the AgileOne Group in the USA. This will involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we transfer to AgileOne Group in the USA we use contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures (Technical and Organisational Measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. A summary of these measures is set out in the Glossary

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#)

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#). A summary is provided below

- **AgileOne** provides workforce management, sourcing and payrolling services and related proprietary technology solutions to its customers.
- **AgileOne** engages with its customers, suppliers, contingent workers and employees to provide the workforce management services and to deliver its proprietary technology solutions.
- **AgileOne** pays staffing suppliers and contingent workers for services provided.
- **AgileOne** markets and advertises its services and actively seeks sales leads.
- **AgileOne** employs staff and engages independent contractors in order to further its legitimate interests.
- **AgileOne** develops, supports and maintains proprietary technologies globally related to

workforce management solutions with support provided from US, EU and India.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the AgileOne Group acting as processors and providing corporate services including HR, IT and system administration services, payroll, finance & accounting, legal, and invoicing/billing.

External Third Parties

- Payroll administration providers.
- Staffing vendors.
- Customers.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Governmental tax and revenue.
- Hosting companies.
- Cloud IT service providers (SaaS).
- CRM providers.
- Learning management service providers.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to

object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

AgileOne Group Companies:

ACT*1 Services Limited (UK)

ACT1 Group – Agile1 Netherlands b.v.

ACT1 Group – Agile1 Ireland Limited

ACT1 Group – Agile1 France Sarl

ACT1 Group – Agile1 Germany GmbH

ACT1 Group – Collect Germany GmbH

ACT1 Group – Allsource Germany GmbH

ACT1 Group – Agile1 Poland sp.z.oo

Technical and Organisational Measures

- 1) Access controls must be implemented and governed by policy. The policy must be reviewed and updated at least annually. Policy should include the following as a baseline
 - a. Password complexity requirements
 - b. Role-based access controls
 - c. Vendor or third-party access controls and requirements
 - d. Account lockout durations
 - e. Multi-Factor Authentication (MFA) requirements
- 2) Routinely review and approve access to systems managing Agile1 personal data information and sensitive data at least quarterly to remove unauthorized access.

- 3) Change all default account names and/or default passwords.
- 4) Network access controls must be implemented and governed by policy. The policy must be reviewed and updated at least annually
- 5) Web servers or other internet facing assets must be logically or/and physically segregated from non-internet facing assets.
- 6) Vendor or third-party connections are logically or/and physically segregated from critical infrastructure unless providing support for the infrastructure.
- 7) Critical or Sensitive data leaving the organization must be encrypted in transit
- 8) Use strong encryption to protect personal data information and sensitive data when stored.
- 9) Access and Security logs must be reviewed at least daily for inconsistencies and unauthorized access events.
- 10) Physical access to company or data center facilities must be monitored for unauthorized accessed.
- 11) Anti-Malware endpoint security solution must be utilized and enforced by policy. The policy must be reviewed and updated at least annually. Anti-virus definitions must updated at least daily if signature based Anti-virus is being utilized
- 12) Firewalls must be utilized for controlling ingress and egress traffic to production networks and governed by policy. The policy must be reviewed and updated at least annually.
- 13) Intrusion Prevention and Intrusion Detection systems must be utilized to monitor events, identify and logging incidents and stop potential threats.
- 14) Monitor firewalls, IPS/IDS at the perimeter and internally as necessary.
- 15) Patch management controls must be implemented and governed by policy. The policy must be reviewed and updated at least annually. Critical patches must be applied within 30 days of identification.
- 16) Operating system hardening must be implemented and governed by policy. The policy must be reviewed and updated at least annually.
- 17) Have and use an Incident Management process with procedures to notify Agile1 as soon as reasonably possible of confirmed attack, breach, unauthorized access and loss of Agile1 information.
- 18) Conduct generalized penetration testing at least annually and after any significant infrastructure or application upgrade or modification.
- 19) Conduct periodic vulnerability assessment based on industry best practices. All assessment findings with CVSS score of 4 or higher must be addressed via a repeatable process.
- 20) Maintain reasonably up-to-date software on all services, systems and devices that may be used to access personal data information.

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