

Clairvoyix and the EU General Data Protection Regulation

What is GDPR?

The European Union General Data Protection Regulation (EU GDPR) is a data privacy law effective May 25, 2018 and will apply to any company that processes data for EU residents, regardless of the business location, in the context of the activities of the establishment.

Our Role Defined

As defined in the EU GDPR, Clairvoyix operates as a “Processor” of our client’s data. Our clients are the “Controller” of their guests’ data. Clairvoyix collects what is required for client directed marketing purposes, uses that data as directed by our client/controllers, and keeps the data for the period-of-time determined with our clients.

Clairvoyix is sensitive to both the

- Privacy of the data, that is, the data’s collection and use, and
- The Security of the data, that is, our physical and technical safeguards to protect that data.

Clairvoyix has documented information security procedures as well as documented architecture security documents, which may be requested from Clairvoyix.

Data Privacy

Data Collected

Clairvoyix keeps the following data elements that can be identified as Personally Identifying Information that we obtain from the data feeds of our clients:

- Name (first, middle initial, and last)
- Mailing address (all elements)
- Email address (both personal and company email, if provided)

We do not receive or maintain “sensitive” or “restricted” data. Examples would include, but are not limited to: social security numbers, passport numbers, credit card numbers, and drivers license numbers.

Clairvoyix follows the theory of minimization, which we interpret as:

- Only collect the data we need
- Only use it for the purposes granted by the controller
- Only keep it for the period-of-time agreed to by our clients

From the data that is received and maintained, which also includes transactional information from a guest action, such as hotel stay-dates, revenue amounts, and marketing identifying fields (guest type, source of data, etc.), email marketing campaigns are developed and deployed. These email campaigns are performed for and at the specific direction and approval of our clients. **This guest data is not used for any other purpose other than as authorized by our clients.**

Email Preferences – opt-in/ opt-out

Clairvoyix maintains opt-in/ opt-out status. This information comes to us either directly from the client's (controller's) data, or from the specific email service provider used by the client. Clairvoyix provides the capability to opt-out or opt-in persons via their email address, and this functionality is available for use by our clients.

For GDPR, it is no longer sufficient to assume an opt in status based on a provided email; the guest must specifically opt in. Therefore, as of May 25, 2018, all guests that we have identified as being part of the European Union, will be opt-out from email selection. After that date, any email status that we receive in our regular daily updates from the client, or their email service provider, will be used, as we will make the assumption that the client has obtained the correct opt-in permissions for the guest prior to being forward to us for processing.

Within the functionality of opt-in/ opt-out, Clairvoyix will provide the capability of “right to erasure or to be forgotten,” which, if used instead of opt-out, will completely erase the person from the database. NO record of their prior existence will be maintained.

Data Breach

Clairvoyix maintains a “Data Breach” methodology, should that ever become necessary. The methodology includes the steps of:

1. discovered/documentated,
2. contained/analyzed
3. notification must be initiated
4. the incident should be eradicated and prevented from happening again.

For each client, Clairvoyix will maintain the correct contact information, should notification be necessary.

Data Security

Clairvoyix maintains information security procedures for our valuable client data, and this document may be requested from Clairvoyix.

The Clairvoyix servers are maintained in a colocation data center operated by Switch (www.switch.com). Las Vegas, Nevada is home to Switch's **Tier 5® Platinum** rated multi-tenant/colocation data centers. With approximately 2 million square feet of data center space and capacity to deliver up to 315 MW of power, it is the most advanced, secure, and most efficient data center campus in the world.