

FACTSET'S GDPR COMPLIANCE STRATEGY

› The EU General Data Protection Regulation (GDPR) went into effect on May 25, 2018. This new EU data protection framework requires organizations to develop data protection programs with an emphasis on accountability, transparency, individuals' rights over their personal data, and security standards.



Our clients may be subject to the GDPR where they are established in the EU or where they offer products or services to, or monitor the behavior of, individuals in the EU. FactSet may be subject to the GDPR in certain circumstances with respect to data obtained from clients or other third parties.

The purpose of this document is to give an overview of our compliance strategy for GDPR. A detailed description of how we collect, process, and use personal data subject to the GDPR is set out in our FactSet GDPR Data Protection Notice available at www.factset.com/privacy.

FactSet is committed to complying with all laws and regulations applicable to our personal data processing activities, and to providing commercially reasonable assistance to our clients to help them meet their compliance obligations.

FACTSET'S ROLE UNDER THE GDPR

The GDPR distinguishes two roles that organizations can play: data controllers and data processors. A data controller is the entity that makes decisions about personal data, and a data processor is a service provider that processes personal data on the instructions of a controller.

As set forth in our *GDPR Data Protection Notice*, FactSet acts as a data controller with respect to some functions and a data processor with respect to other functions.

Data Controller

FactSet acts as data controller when we determine "how" and "why" data is processed. Specifically, we act as a data controller with respect to certain personal data of individuals who are authorized to use FactSet's products and services, such as data related to (i) FactSet's administration of business contact information, login names, end user profiles, and any personal details required for the authorized individual user to avail themselves of the client services provided, (ii) the provision of service support to resolve any inquiries or complaints from clients, and (iii) reporting to other data vendors and exchanges in order to facilitate the provision of services to the client. FactSet only gathers this data in order to provide requested FactSet products and services to clients and their authorized users (e.g. names, business telephone numbers, and business email addresses of authorized users of the FactSet Workstation).

FactSet also acts as data controller for business contact information of our clients' representatives in order to manage our relationships with clients.

As set forth in our privacy policy, FactSet will not provide or sell any service-related business contact information except as may be required in compliance with law or to provide clients with services, such as enabling them to access certain third-party supplier data and reporting usage to those suppliers. For more detail about when and how FactSet acts as a controller of data, please review our *GDPR Data Protection Notice*.

Data Processor

FactSet acts as a data processor on behalf of our clients when clients or their authorized users upload personal data of individuals residing in the EU onto FactSet's systems, since that data is processed in accordance with the client's instructions. In such cases, our clients act as controllers of the personal data they or their end users upload to our platforms for processing through our solutions.

If in using our products and services, you upload onto our systems data that contains personal information of individuals who are resident in the EU (other than the data required for FactSet to perform services, as set forth in the data controller explanation above and in our *GDPR Data Protection Notice*), please contact our team to inquire about data minimization opportunities. It is not our intent to otherwise process personal data. In the event that the provision of such personal data is integral to your use of FactSet's products and services, FactSet will provide you with our client data processing addendum.

Neither Data Controller or Data Processor

There may also be instances when FactSet is neither a controller nor a processor, because we do not have access to, or otherwise process, personal data.

HOW FACTSET HELPS CLIENTS COMPLY WITH GDPR

In order to help clients comply with the GDPR, FactSet has developed:

- A client data processing addendum for instances when FactSet is acting as a data processor (as described herein), which meets the contractual requirements of GDPR Article 28. This addendum also incorporates the EU Commission-approved standard contractual clauses to ensure that your personal data can be lawfully transferred to FactSet's processing operations outside of the EU. Subject to this addendum, we will process personal data pursuant to your instructions and use of our services. Please contact dataprivacy@factset.com to request a copy of our client data processing addendum;
- A detailed privacy notice (our *GDPR Data Protection Notice*) which explains our data protection practices, and is available to review at www.factset.com/privacy;
- Security standards to keep personal data safe and secure, such as encryption, access controls, and data minimization (in each case where appropriate and to the extent proportionate);
- Procedures to ensure that any supplier to FactSet who might process on our behalf client personal data subject to GDPR enters into data processing terms that meet GDPR Article 28 requirements;
- A SOC or ISO:27001 certification of FactSet's primary data centers in the United States and regional data centers around the globe;
- A global Privacy Steering Committee that drives information governance and privacy efforts across our entire business. The team includes privacy champions throughout the company; and
- Support to clients seeking information on FactSet data privacy compliance activities.

FACTSET'S COMMITMENT

FactSet is committed to integrity in all of our obligations to our clients and in the communities we serve around the world. In developing our data privacy compliance strategy, we have undertaken compliance assessments, and partnered with external counsel to assist us in developing this compliance program. This overview is provided for your convenience, as such it is a non-binding statement and should not be regarded as a representation about our practices or legal advice. If you have questions about the GDPR, your obligations, or FactSet's compliance strategy, please contact FactSet at dataprivacy@factset.com.