



Data Storage Information Sheet

- ATG has selected to utilize the services of the Google Cloud Platform as a means for the storage of the enormous volume of data it collects on behalf of our clientele.
- This decision was taken based on the exceptional service levels provided by Google, as well as their commitment to data security and international data protection legislation. Google, like ATG, has aligned not only with the local legislation having jurisdiction over its headquarters, but with the European Unions General Data Protection Regulation (GDPR) which is at the forefront of Data Protection Legislation and has become the benchmark for many newer Acts, such as the South African Protection of Personal Information Act (POPIA)
- We have aligned our privacy policies with both GDPR as well as POPIA. Under these laws, ATG is defined as the Operator (called Processor under GDPR) with our customers being defined as the Responsible Party (Controller under GDPR). This means that our customers are responsible for determining the purpose for information collection, as well as the level of detail required from Data Subjects, and that they are the sole owners of the information collected.

- As Operator, ATG will not sell, share, or rent this information to others, and is contractually and legislatively bound to adhere to this commitment. Our objective remains to facilitate the collection of information on behalf of a contractually stipulated third party, our client.
- Any information scanned by our devices is encrypted and immediately uploaded to secure cloud storage. Our use of the Google Servers means that this cloud upload is defined as an International Data Transfer, although the transfer is for the express and exlusive purpose of storage and is not intended for processing.
- GDPR and POPIA provides for several mechanisms to facilitate transfers of personal data outside of the country of origin. These are aimed at confirming an adequate level of protection or ensuring the implementation of appropriate safeguards when personal data is transferred internationally:
 - The foreign country has a law that provides adequate protection.
 - There are appropriate safeguards (such as binding corporate rules, standard data protection clauses, an approved code of conduct etc.)

- Google has exceeded the requirements set out
 Google has a number of external security above, through the provision of explicit commitments within policies and contracts, but also through the acceptance of the requirements of GDPR as well as the local American Data Protection Legislation.
 - certifications provided as verification of their commitment to securing the data we upload, thereby enabling ATG to transfer data to their servers safely and lawfully.
 - ISO 27001 (Information Security Management)
 - ISO 27017 (Cloud Security)
 - ISO 27018 (Cloud Privacy)
 - SSAE16 / ISAE 3402 (SOC 2/3) (Service Organization Controls)

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