

## **Scytale AI, on behalf of Valkyrie Security**



Date: 14/10/2024

The General Data Protection Regulation (GDPR) is a Regulation of the European Union and, from 25 May 2018, it applies to all organizations that collect and process the personal data of EU citizens.

As a responsible, forward-looking business, Valkyrie Security recognizes at senior levels the need to comply with the GDPR and to ensure that effective measures are in place to protect the personal data of their customers, employees, and other stakeholders, and to ensure that such data is processed lawfully, fairly and transparently.

Commitment to the security of personal data extends to senior levels of the organization and is demonstrated through the implementation of relevant policies and the provision of appropriate resources to establish and develop effective data protection and information security controls.

As part of meeting their legal obligations, Valkyrie Security has implemented a comprehensive program to understand and validate their use of personal data, and to verify the lawful basis of their processing.

Further to this, Valkyrie Security confirms that:

- A policy is in place for the protection of personal data within Valkyrie Security that has been approved by management and communicated to all employees.
- All employees have received awareness training regarding data protection and the GDPR
- All employees have received training on their roles in the protection of personal data
- Valkyrie Security has identified the personal data they process, including where special categories are concerned
- Valkyrie Security has established the lawful basis for each instance where they process personal data under the GDPR

- Where Valkyrie Security has used the lawful basis of legitimate interest, Valkyrie Security has conducted a documented LIA, to assess the benefits versus the impact on the data subject's personal data
- In those cases in which their processing is based on consent, Valkyrie Security has taken steps to ensure that the data subject's consent is given clearly and freely and that it is recorded, including consideration of parental consent for children
- Valkyrie Security uses a privacy policy, to ensure that the required privacy information is provided in clear language whenever they collect personal data and it's communicated to the data subjects
- Tested procedures and online user facilities have been implemented to promptly process and fulfil data subject access requests, such as consent withdrawal, access, deletion and rectification
- The length of time for which they keep personal data, and the way in which this is determined, is defined in each area of processing and has been minimized
- They are keeping records of processing as required by the GDPR
- In instances in which they are a controller, all of their contracts with processors have been updated to comply with the requirements of the GDPR
- In instances in which we act as a processor, we are contractually committed to complying with the requirements of the GDPR
- All their employees are subject to confidentiality obligations with respect to personal data
- In instances in which we transfer personal data internationally, Valkyrie Security has ensured that the transfer is legal under the GDPR
- Where appropriate, a data protection impact assessment protocol that aligns with the requirements and recommendations of the GDPR and relevant best practices will be used
- By default, they plan for data protection in new or changed services and systems, including minimizing their use of personal data and protecting it via techniques such as deidentification.
- Valkyrie Security has tested procedures in place to fulfil their obligations in the event of a breach of personal data, both as a controller and as a processor
- Valkyrie Security has policies and other controls in place to provide appropriate protection of personal data, based on a thorough assessment of risk

Valkyrie Security, supported and assessed by Scytale AI on an ongoing basis, will continue to develop and improve data protection policies and controls over time, guided by legal requirements and the needs and preferences of customers and partners.

**Tracy Boyes**  
Legal and Data  
Privacy  
[tracy@scytale.ai](mailto:tracy@scytale.ai)

