

GDPR Statement

The [EU General Data Protection Regulation \(GDPR\)](#) went into effect on May 25, 2018. This regulation sets new standards for how organizations collect, use, protect, and otherwise process EU personal data. The GDPR imposes significant obligations on a wide variety of businesses, both in the European Union and around the world, requiring them to comply with numerous data protection obligations and, in many cases, to realign certain aspects of their operations.

In partnership with outside experts, Universal Rx has worked diligently to assess the impact of the GDPR on our business. Universal Rx is committed to GDPR compliance insofar as the regulation applies to our operations, and to working with our customers to help them meet their compliance obligations relevant to EU personal data that they provide to us in their capacity as data controllers. Universal Rx has determined that GDPR is applicable only to Universal Rx's Expatriate Prescription Services ("EPS") program.

Where necessary and appropriate we have implemented technical and organizational measures that include rigorous data privacy and security policies and procedures, and we maintain documentation of our processing activities as required by law. Among other steps, Universal Rx has undertaken to:

- Maintain the confidentiality of EU personal data;
- Protect such personal data from destruction, loss, or unauthorized access through the enforcement of stringent security procedures;
- Where appropriate, provide data controllers with access to information regarding subprocessors that we may engage to process EU personal data on our behalf;
- Cooperate with data controllers to help them respond to data subject requests to exercise their rights under the GDPR;
- Assist data controllers with data protection impact assessments concerning Universal Rx's processing activities and allow audits to the extent required by the GDPR;
- Promptly notify data controllers of personal data breaches affecting the controller's personal data;
- Provide verification of our third-party security certifications as requested;
- Use appropriate mechanisms (such as EU-approved standard contractual clauses) to enable the lawful transfer of EU personal data across borders; and
- Ensure the timely and secure destruction or proper anonymization of EU personal data as instructed by the relevant data controller.

Universal Rx has taken a proactive approach to GDPR compliance by implementing various legal tools to meet GDPR requirements for data transfers, including individual consent forms for EU data subjects and GDPR-compliant data processing agreements to cover processing activities carried out by Universal Rx on behalf of EU data controllers.

Additional questions may be addressed to Universal Rx's Privacy Officer at privacy@universalrx.com.
