

Fielo Privacy Datasheet

Intro

Fielo engaged independent data privacy risk management provider TrustArc™ to review and document the data flows and practices described in this datasheet. The purpose of this document is to provide customers of Fielo with information needed to assess the impact of this service on their overall privacy posture by detailing how personal information may be captured, processed and stored by and within the Fielo platform.

Product Summary

Fielo is the first end-to-end Channel Loyalty & Incentive Automation Platform Built in the Cloud. The product helps organizations create, manage and optimize highly scalable channel incentive programs to drive improved performance from partners, resellers and customers.

GDPR and Fielo

The EU General Data Protection Regulation (GDPR) is a Europe-wide set of data protection laws designed to harmonize data privacy practice across Europe. The widespread use of the Internet, technological advances in cloud storage and the advent of social media has changed the way data is processed and transferred. This means the previous rules not only needed to be updated, but needed to be uniform across Europe and applied more rigorously. The emphasis in the EU law is on protecting citizens and their data, and giving users more information about and control over how it is used. Anyone who processes personal data of EU residents, especially in the context of selling goods or services, needs to comply with GDPR.

Fielo functions as a Data Processor and we are required to process data in strict accordance with the instructions provided by the Data Controller, our customer. Our use of the data is strictly limited and our role is to act only as directed by the Controller and to provide assistance to the Controller in executing their responsibilities under the GDPR.

Information Processed

As part of the B2B services we provide to our customers, Fielo collects a limited amount of personal data – including name, address, position, email/phone contact information. Please review our *Privacy Policy* for information describing how we use and protect personal data in our custody.

Each customer's system administrator controls access to Fielo platform and applications. Access is limited to users who are authorized by the administrator. Our customers have complete control over the administration and management of their loyalty Incentive rewards program, including changing the rules engine and approving transactions. In addition, customers can track/monitor changes and manage access to every record they create in the Fielo platform.

Data contained within the customer's Fielo environment may be accessed by Fielo Customer Support teams exclusively for troubleshooting purposes and only if the customer's administrator enables access. All such access is logged and can be reviewed by the customer.

We occasionally hire other companies to assist us in providing products or services, handling the processing and delivery of mailings, providing customer support and managing rewards solutions. These companies are only permitted to obtain only the information they need to deliver the service. They are required under strict contract rules to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

The Use of Cookies

In some instances, Fielo deploys cookies and locally stored data in the application of its service. When website tracking data is stored on an individual's machine, current European regulations require notice be given and consent obtained. These requirements continue under the GDPR and are anticipated to be strengthened when the EU publishes additional new regulations in the near future. It is our customers' responsibility as the entity that controls the website, to provide that notice, even if a third party is performing that activity on their behalf. As a result, the notice should include the adequate disclosures about the purpose for that activity and how individuals can opt out (including links to any necessary third party opt out processes).

Data Subject Rights

GDPR provides individuals with a range of rights regarding their personal data, including the right to access, correct, erase or transfer their personal information. The Fielo platform can assist you in complying with Data Subject Requests such as:

- Access to Data for review or correction;
- Retention: the amount of time personal information remains on the system before being aggregated or anonymized;
- Deletion – Erasure: the ability to ensure personal data are deleted or erased when requested by an individual;
- Transfer or Portability: the ability to provide the customer with a copy of all of their personal data in a machine readable format.

Security

Fielo has taken technical and organizational measures to ensure that Personal Information we have collected or will collect in the future is secure. For example, we have limited the number of people who have access to Personal Information, by electronic security systems and password protections that guard against unauthorized access. We always use industry-standard technologies when transferring and receiving consumer data we receive. We have security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from you in connection with our services.

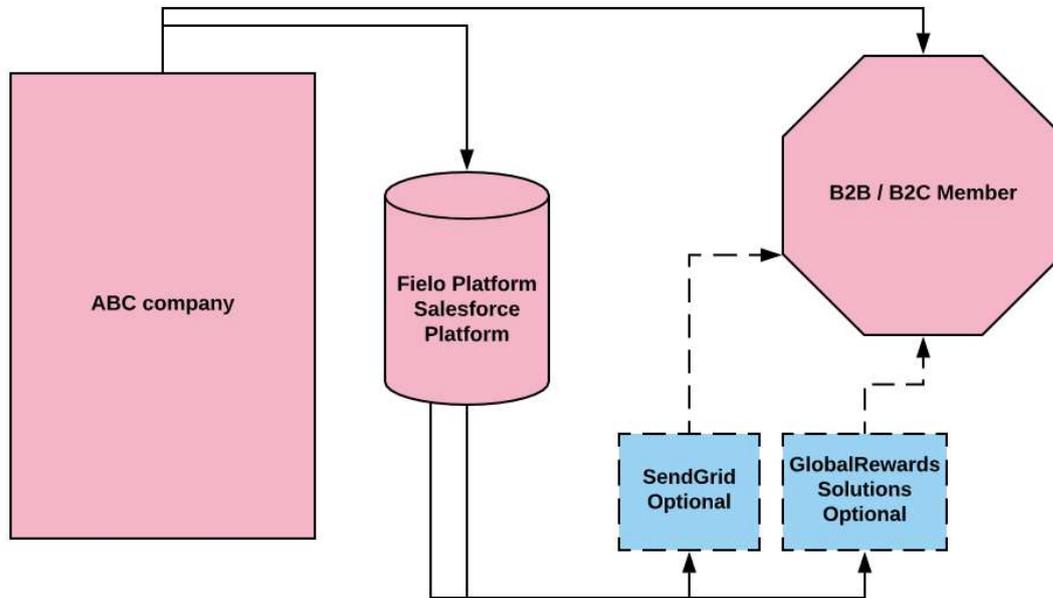
Retention

Fielo retains Personal Information for as long as needed to provide the services or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Customer data can be anonymized upon request.

External Links/Resources

For additional information, please consult our [Privacy Policy](#) – If you have any questions or would like further details about our privacy program, please contact our Data Privacy Officer at Privacy@Fielo.com

Dataflow map (optional)



About this Datasheet

The information contained herein is based upon document reviews and interviews with relevant subject matter experts involved in the development and operation of the services described. The discovery process relied upon the good faith accuracy of the information provided; TrustArc has not undertaken an independent audit and does not certify the information contained in this datasheet. However, the information contained herein was believed to be accurate and complete as of the time this datasheet was first published. Please note that the information provided with this paper, concerning technical or professional subject matters, is for general awareness only, may be subject to change and does not constitute legal or professional advice, nor warranty of fitness for a particular purpose or compliance with applicable laws.