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Phygit

Report on executed work to comply with the GDPR requirements



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This report evaluates the compliance of the group of companies representing the Phygit brand (hereinafter referred to as Phygit companies) with the requirements of the GDPR and describes the work performed to improve Phygit's compliance with the requirements of the GDPR. The work was carried out by DPO Europe GmbH in two phases in July 2021 and August 2023, with consulting services provided between the two phases.

The purpose of this project was to assess the current level of personal data protection in Phygit, to compare the existing personal data protection measures in Phygit with mandatory and/or recommended measures and best practices in the European Union, to provide recommendations on how to bring the processes in line with GDPR, and to implement some of them.

The **first phase** of the project consisted of the following steps:

1. GDPR Gap analysis.
A gap analysis was conducted in the format of interviews with Phygit representatives and simulating the user journey in the Phygit product. As a result, a record of processing activities was compiled.
2. Development of public documents that implement the transparency principle.
Privacy policies for the website and product have been drafted.
3. Risk assessment.
The consultants, in conjunction with the product team, conducted Data Protection Impact Assessment (DPIA) and Privacy by Design (PbD) sessions aimed at formulating risk scenarios, assessing the severity and likelihood of risks, creating safeguards to mitigate risks and to implement the GDPR principles and the rights of data subjects. At the end of sessions product team received an Action Plan with the needed controls, systematized by priority.

The **second phase** of the project consisted of the following steps:

1. Interviews with the product team to identify changes in data flows.
2. Entering updates to the record of processing activities.
The update includes adding new purposes for processing activities and correcting the existing ones according to business needs, adding new categories of personal data, editing the list of data recipients, and changing formulations for the list of categories of data subjects.
3. Preparation of a report on GDPR compliance level, drafting privacy commitment for partners, and recommendations on entering into data protection agreements with clients.



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DPO Europe GmbH is not responsible for the accuracy, completeness, and reliability of the information provided. Recommendations are given in accordance with the legislation and guidelines effective at the time of the audit and the existing court practice.

Based on the work performed, Phygit's overall level of GDPR compliance was determined to be satisfactory and requires further work and maintenance.

Recommendations for maintaining GDPR compliance:

1. Review and if needed update the record of processing activities on a semi-annual basis.
2. Update the privacy policies in correspondence with the changes made to the record of processing activities.
3. Update an Action Plan of controls (according to Data Protection Impact Assessment (DPIA) and Privacy by Design (PbD) sessions conducted) by the safeguards implemented.
4. Establish a registry for vendor management with at least entries with vendor name, country of location, and the relevant data processing agreement.
5. Publish a GDPR Commitment for partners.

Director

A handwritten signature in blue ink, appearing to read "Andrei Hrynash".

Andrei Hrynash

