

STATEMENT OF GDPR COMPLIANCE PROGRAM ACTIVITIES FOR CAVA ROBOTICS INTERNATIONAL LLC

PREPARED BY EAGLE CONSULTING PARTNERS, JUNE 27, 2019



SUMMARY

CAVA Robotics International LLC ("CAVA") engaged Eagle Consulting Partners Inc. ("Eagle") in August 2018 for support in establishing a compliance program for the European Union General Data Protection Regulation (GDPR). Eagle had previously assisted CAVA with United States Health Insurance Portability and Accountability Act (HIPAA) compliance activities.

Eagle Consulting Partners is a governance, risk, and compliance consulting agency based in the United States. Eagle is experienced with numerous federal and state regulatory frameworks in addition to GDPR, including HIPAA, the Family Educational Rights and Privacy Act (FERPA), the Individuals with Disabilities Education Act (IDEA), federal substance use disorder regulations (42 CFR Part 2), the New York State Dept. of Financial Services Cybersecurity Regulation (23 NYCRR 500), and many others. Capabilities include Privacy and Security Audits, Policy and Procedure development, Policy Gap Analyses, Security Risk Assessments, Network and Application Vulnerability Analysis, and security remediation.

GDPR COMPLIANCE PROGRAM ACTIVITIES

Eagle performed the following compliance activities for and on behalf of CAVA:

1. **GDPR Privacy Assessment.** Eagle reviewed the business processes in detail, including a review of purposes and means of processing personal data, an inventory of the types, categories and quantity of data, current and intended uses for the data, data retention practices and specific methods currently used for transforming raw, individually identifiable data into a blinded and/or deidentified/anonymized data.
2. **GDPR Compliance Strategy.** Eagle formulated a compliance strategy to define CAVA as either controller or processor for various business activities, to appropriately undertake any cross-border processing, to adopt appropriate codes of conduct, to address anonymization needs, to properly manage data sharing, to establish a mechanism for settling privacy complaints, and to define and establish the data protection officer responsibilities. The strategy also reviewed relevant country-specific regulations. The strategy was reviewed and approved by CAVA and CAVA's legal counsel.
3. **Policies and Procedures.** Eagle created customized privacy and security policies and procedures for CAVA designed for simultaneous compliance with GDPR and HIPAA.
4. **Security Risk Analysis.** Eagle had previously performed a HIPAA Security Risk Analysis for CAVA. That analysis was updated to review the additional elements of a security risk analysis required under GDPR.
5. **Model Agreements.** Eagle created model GDPR-compliant contracts for CAVA's use, including a model agreement for use with a customer and a model agreement for use with subcontractors.
6. **Implementation Plan.** Eagle prepared a plan detailing CAVA's tasks to implement the various policies and procedures created, and to implement other obligations for GDPR compliance.
7. **Training.** Eagle prepared and conducted training for CAVA staff regarding their duties under GDPR.