

Cosmos Continuum's General Data Protection Regulation (GDPR) Policy

Last updated: June 2022

Cosmos Continuum is fully committed to the GDPR and respects the privacy rights of its customers and visitors.

The use of the term EU in this policy also applies to the countries within the European Economic Area (EEA).

The GDPR is a regulatory law. As a law, there is no certification agency, but all companies that store or use an EU citizens' data are required to comply with the regulation. Cosmos Continuum regards its user's personal data privacy and security as one of its top priorities.

After Brexit the UK-GDPR and Data Protection Act of 2018 became the Data Protection Legislation for the UK. It is referred to as the UK-GDPR because it is essentially the original GDPR with some modifications.

For example:

- In the UK-GDPR terms like 'European Union' have been replaced with 'United Kingdom' and 'European Union law' has been replaced with 'domestic law'.
- The Information Commissioners Office (ICO) is the highest supervisory authority for enforcing data protection regulation in the United Kingdom as opposed to the European Data Protection Board.

Other changes can be found in the United Kingdom Government's Data Protection, Privacy and Electronic Communication (DPPEC) Regulation. This includes changes in the field of national security, intelligence services and immigration. Firstly, there is the ending of the co-operation mechanism between European Union supervisory authorities and the ICO. Secondly, there is the removing of the one-stop-shop mechanism regarding data breaches and the establishment of the extra territorial jurisdiction that the United Kingdom will have when companies sell to the United Kingdom or monitor behavior of United Kingdom citizens. Furthermore, the age of consent for the processing of personal data is lowered to 13 (16 under the GDPR).

Cosmos Continuum provides full compliance with the applicable EU-GDPR and UK-GDPR regulations. We are committed to providing complete security and privacy for Cosmos Continuum user's personal data.

Data processing

Data is not collected on our website and data collected in the Cosmos Continuum app is only available to the user. Data is transmitted to Cosmos Continuum servers using secure encryption methods and encrypted at rest and in operation on our servers.



Controls

Cosmos Continuum regularly reviews its Information Security Policy and its procedures.

Data Protection

Cosmos Continuum products conform to information security's best practices. In line with GDPR, appropriate measures are assessed in terms of a variety of factors including the sensitivity of the data, the risks to individuals associated with any security breach and the nature of the processing. Regular testing of Cosmos Continuum's security is a continuous process at Cosmos Continuum.

Data Transition

The Cosmos Continuum App user data are stored encrypted on US servers. The personal data is not readable by Cosmos Continuum personnel and is never sold or shared. This is at the core of Cosmos Continuum's corporate policy and is enforced by the technology lockboxes employed.

Sub-Processors

Cosmos Continuum does not utilize sub-processors.

Requests

Inquiries on data updates or Cosmos Continuum's Data Privacy policies should be addressed to info@CosmosContinuum.com.

EU Cross-Border Data Transfer

Cosmos Continuum's user's personal data is encrypted and not readable by humans or APIs from the moment it is entered into the Cosmos Continuum App.