
GDPR Frequently Asked Questions (FAQs)

The capitalized terms we have used in these FAQs are terms specifically defined within the EU General Data Protection Regulation (GDPR). The FAQs are for your general information purposes only. We encourage you to consult your legal counsel for questions related to your specific application.

What is GDPR?

GDPR is a data privacy regulation that replaces the Data Protection Directive 95/46/EC, effective May 25, 2018. GDPR is directly applicable in each EU Member State and is intended to harmonize data protection requirements across the EU. It governs handling of personal data and sets out obligations for Data Controllers and Data Processors (defined below).

Whose personal data is covered by GDPR?

Generally, anyone who has data processed (processing includes collection, access, analysis, storage, transfer, deletion) inside the EU. That covers both residents and visitors, in so far as they interact with organizations established in the EU, or firms outside the EU set up to process data of people inside the EU.

What is a Data Controller?

The entity which alone or jointly with others determines the purposes and means of the Processing of Personal Data.

What is a Processor:

The entity which Processes Personal Data as instructed by the Data Controller.

Is UL a Data Controller or a Data Processor?

In connection with services that we have determined are subject to GDPR, UL Information and Insights Inc. and Safeware Quasar, Ltd. (each a direct or indirect subsidiary of UL LLC, and, collectively, the "UL PSI Entities") is the respective Data Processor and each client is a Data Controller.

Does GDPR mean that the data must reside in EU member states?

No, GDPR does not require EU Personal Data to stay in the EU, nor does it place any new restrictions on transfers of Personal Data outside the EU. Businesses may transfer Personal Data to a country outside the EU based on a mechanism from which an adequate level of data protection can be guaranteed e.g. the standard contractual clauses approved by the EU Commission or Privacy Shield certification.

Do we need to get any additional contract terms in place with UL?

Yes, if you have Personal Data of any European residents stored within products covered by GDPR and offered by UL Information and Insights Inc. or Safeware Quasar, Ltd., GDPR requires certain contractual terms be in place. These terms are incorporated into our Master License and Service Agreement for all new clients. A [GDPR Processor Terms Addendum](#) is available for existing clients to sign and return for countersignature to ULPSI.GDPR@UL.com. Because processing of Personal Data is necessary for the performance of our contract with a client, we do not separately obtain consent from each Data Subject. However, UL does seek consent from Data Subjects it collects data from when acting as a Data Controller as part of UL's marketing activities.

How is Personal Data used in our services (Lawfulness of Processing as per Article 6)?

Our services use Personal Data to fulfill obligations in our client agreements. Such instances include the use of names and email addresses to create unique user accounts, provide clients' audit trail functionality and in some cases to process payment for services. On the UL Supply Chain Network platform, we offer functionality that allows suppliers and manufacturers to exchange information, including personal data.

Do we process any special categories of Personal Data?

No. We do not need or want to store any special categories of Personal Data such as health information, ethnicity, political beliefs, etc. Clients should not enter this type of Personal Data into our SaaS products. We accept no liability resulting from clients' provision of this type of Personal Data.

Do the UL PSI Entities use any third-party vendors (Sub Processors)?

Yes, the UL PSI Entities do utilize third-party Sub Processors (outside the EU) that support their services. These third-party vendors have been vetted for GDPR alignment. The list of current third-party vendors can be found at <https://psi.ul.com/en/gdpr>. Any updates to the use of third-party Sub Processors will be posted on this website and clients can sign up on the website to receive email notice of any changes.

Who is UL's Supervisory Authority?

UL's Supervisory Authority is the Office of Data Protection Commissioner in Ireland.

Does UL have a Data Protection Officer?

UL is not obligated to have a DPO, as UL does not or is not:

- A public authority;
- Carry out large scale systematic monitoring of individuals (for example, online behavior tracking);
or
- Carry out large scale processing of special categories of data or data relating to criminal convictions and offences.

However, UL does have a Data Protection Director located in Dublin, Ireland. The Data Privacy Director may be contacted at 33 Westland Square, Pearse Street, Dublin 2, Ireland.

How will UL manage data transfers to a third country under the GDPR?

Data transfers to third-party non-EU state Sub Processors is limited to those entities who have been vetted for GDPR alignment. All such data transfers are executed via a secured and encrypted method.

Sub Processors have signed required GDPR data processor terms, including security obligations, and have signed model clause agreements. Any transfers of personal data to a third country outside of the European Economic Area will include appropriate safeguards such as standard contractual clauses approved by the EU Commission (available <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>).

How will UL manage the Right to Erasure (also known as the right to be forgotten)?

With most of our applications, a Data Controller client, as the account administrator, controls the access of its users (i.e., Data Subjects) to our applications and can de-activate a user. Upon request of a Data Controller, UL shall either anonymize or assist a Controller client with anonymizing specific Personal Data retained within an application. Requests to anonymize any Personal Data should be submitted to ULPSI.GDPR.@UL.com with the following information:

1. Name of Client
2. Name of UL PSI Entity that is the contracting party (UL Information and Insights Inc. or Safeware Quasar, Ltd.)
3. Identify UL Service
4. Client Contact Name
5. Client Contact Details (email/telephone)
6. Name of Data Subject or other personal information to be anonymized.

We will not respond directly to Data Subjects in the event they contact us to assert any rights under GDPR and will instead refer the request back to the applicable Data Controller client unless applicable laws prevent us from doing so.

Where is data stored?

Data is stored in one of the following locations based on the UL contracting entity and the particular service:

Latham, NY, USA

Cloud services in the Eastern USA

Nottingham, UK

Cloud services in Western Europe

How can I learn more about UL's data security measures?

Please contact ULPSI.GDPR.@UL.com for specific data security information relevant to your product or service.

Does UL have a procedure for handling requests or concerns raised by Data Subjects in relation to Personal Data it processes?

Yes. Requests or concerns can be sent to:

UL

Attn: Data Privacy Director 33 Westland Square,

Dublin 2, Ireland gdpr@ul.com Should the complaint relate to a Data Subject for which a client of ours is the Data Controller, we will refer the matter to such Data Controller as required by applicable law.