

## Data Privacy Frequently Asked Questions

### How does CYPHER Learning ensure data privacy and security?

We comply with applicable global data protection regulations, including GDPR and CCPA. We implement robust technical and organizational measures, such as data encryption in transit and at rest, two-factor authentication, regular penetration testing, and SOC 2 Type 2 compliance.

### Does CYPHER Learning use sub-processors for data processing?

Yes, we use trusted sub-processors such as AWS, Google, and Microsoft for data storage and management. All sub-processors comply with our stringent data protection standards and undergo regular audits. Our list of sub-processors can be found here:

<https://www.cypherlearning.com/data-processing-addendum>.

### Can data be stored outside the customer's geographical location?

We store data in the US (Virginia), EU (Frankfurt), and AU (Sydney) based on the customer's location and conform to all applicable data protection regulations. Data transfers outside of the agreed-upon geographical area require prior written consent from the customer.

### What type of data is processed by the CYPHER Learning platform?

The CYPHER Learning platform primarily processes customer-generated content, which is controlled and owned by the customer. This typically includes training materials and coursework. Although the platform is not intended for processing Personal Data, low-risk data may be included by customers, such as user login credentials (name, email address, IP address), which is also controlled and owned by the customer.

### Who owns the data uploaded to the CYPHER Learning platform?

The customer retains ownership of all data uploaded to the platform. CYPHER Learning acts as the data processor, processing data on behalf of and as instructed by the customer, the data controller.

### Is CYPHER Learning compliant with industry standards?

Yes, our platform is compliant with major industry standards, including SOC 2 Type 2 and PCI-DSS for e-commerce transactions. We are also working towards ISO/IEC 27001 certification.

## **Can CYPHER Learning assist with data subject requests under GDPR?**

Yes, we have processes in place to help customers manage and respond to data subject requests, such as access, rectification, and erasure of personal data.

## **Can customers use their own Data Processing Agreement (DPA)?**

No, CYPHER Learning provides a standardized DPA tailored to its platform's specific processes, procedures, and compliance measures. This ensures that all customers receive the necessary protections required by applicable Data Protection Laws.

## **Does CYPHER Learning allow customers to audit its data processing practices?**

To maintain platform security, individual customer audits are not permitted. Instead, CYPHER Learning conducts independent third-party audits at least once per year. Results are available to customers upon request in the form of SOC 1 and SOC 2 Audit Reports.

## **How does CYPHER Learning handle data transfers to third parties?**

CYPHER Learning uses third-party sub-processors to provide certain services. A list of these sub-processors and their locations is available here: <https://www.cypherlearning.com/data-processing-addendum>. Appropriate safeguards and contractual obligations are in place to protect customer data during processing by these sub-processors, including forced encryption during transit.

## **What data security best practices should customers follow when using the platform?**

We recommend that customers filter unnecessary data and mask or tokenize any sensitive information before uploading it to the platform. This helps maintain data security and privacy.