

# Protecting Your Data



As the global employee wellbeing leader in information security and data privacy, Virgin Pulse is GDPR-compliant and certified against the ISO / IEC27001 : 2013.

As the only wellbeing provider that places its client data as the highest strategic priority, leading organizations in the financial, defense, health care, technology and government sectors are turning to Virgin Pulse for peace of mind, knowing their data is in safe hands.

#### The State of Information Security & Data Privacy

With the annual cost of malicious data breaches predicted to reach \$2 trillion by 2019, organizations must protect themselves by ensuring their partners and vendors have a well-articulated security and privacy strategy and maintain industry-leading information security and data privacy standards.<sup>1</sup>

#### Virgin Pulse's Approach to Information Security and Data Privacy

At Virgin Pulse, we believe that the strength of our business depends on a robust data privacy and information security program. We protect information assets, personal data and client information whenever and wherever they are created, processed, transmitted or stored to provide seamless, consistent, high-quality client service worldwide.

Our data privacy and information security program is managed by our Global Information Security Team. Their mission is to protect the information assets of Virgin Pulse and our clients and members from unauthorized collection, retention, use, disclosure, modification or destruction. They accomplish this through governance policies, procedures, guidelines and technical security architecture as well as alignment with internationally-recognized best practice frameworks.

We treat the confidentiality, availability and integrity of all client data with the highest strategic priority. Our organization is built upon a culture of security that protects our clients, shareholders and stakeholders, ensuring that:

61%

Percentage of CEOs concerned about cyber security<sup>2</sup>

\$4M

Average total cost of data breach<sup>3</sup>

42%

Percentage of UK organizations requiring vendors to be ISO 27001 certified

- All confidential data is securely stored, processed and exchanged in compliance with international industry best practices.
- Information systems and applications are managed in a way that minimizes risk exposure to clients and members.
- Risk is actively monitored and managed consistently and effectively across the organization.
- We undertake continuous improvements to risk treatments to meet on-going information security needs.
- They have the information and tools to achieve compliance within their own organizations.



# Virgin Pulse certifications & accreditations

## Virgin Pulse maintains internationally-recognized information security and data privacy certifications and accreditations including:

### ISO/IEC 27001:2013

To provide the highest level of continuous operation, Virgin Pulse has implemented an Information Security Management System (ISMS) certified against the International Standard for Information Security, ISO/IEC 27001:2013. This certification validates that Virgin Pulse has implemented these internationally recognized information security controls, including guidelines and general principles for initiating, implementing, maintaining and improving information security management within our organization.

Adopted by thousands of organizations across the world, ISO 27001 implementation puts in place a systematic approach to managing sensitive information, ensuring it remains both secure and available. It is a broad standard covering process, personnel, physical, technical and organizational security. With 172 requirements and 114 controls, it is widely recognized as the highest security standard in the industry for examining the efficacy of an organization's overall security posture.

### Data storage

To ensure the highest level of security and availability for our clients, Virgin Pulse hosts our production application in data centers that maintain a battery of controls, certifications and attestations, including DIACA, ISO 9001, ISO 27001/27002 and SOC 1/SSAE 16/ISAE 3402. To support the specific data security requirements of our international clients, Virgin Pulse also maintains a Tier 1, ISO/IEC 27001 and SSAE 16 certified EU data center located in Frankfurt, Germany, with a backup data center located in Ireland.

### EU Data Protection Directive

EU Data Protection Directive (also known as Directive 95/46/EC) is designed to protect the privacy of all personal data collected for or about citizens of the EU. The directive addresses collection as well as processing, use, or exchange of such data.

The Directive's goal is to protect individual rights to privacy in personal and family life, as well as in the home and in personal correspondence.

The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide U.S. and European companies with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce.

Virgin Pulse has certified adherence to the Privacy Shield Principles of notice, choice and accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability.

The Virgin Pulse Platform complies with the EU-U.S. and Swiss-U.S. Privacy Shield Framework regarding the collection, use and retention of personal information from clients and members in European Union member countries.

### GDPR

The EU General Data Protection Regulation (GDPR) is a new data privacy regulation, effective as of May 25, 2018. The comprehensive law replaces the EU Data Protection Directive (Directive 95/46/EC) and is designed to strengthen and standardize data privacy laws across Europe, protect and give EU citizens greater control over their personal data and regulate how organizations collect and process this personal data.

Based on a thorough review of our internal data privacy processes, procedures, data systems and documentation, we have implemented the requirements as set out in the GDPR across the entire organization to ensure our organization's compliance.

- 1 Jupiter Research
- 2 PWC 19th Annual CEO Survey
- 3 IBM and Ponemon Institute
- 4 Ipsos MORI Cyber Security Breaches Survey

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