

**GDPR-Controls-to-Requirements**

Control Code	Control Name	Control Description	GDPR Chapter	GDPR Requirement
DCF-13	Information Security Policy	Pequity has a defined Information Security Policy that covers policies and procedures to support the functioning of internal control.	CONTROLLER_AND_PROCESSOR	32
DCF-15	Risk Assessment Policy	Pequity has defined a formal risk management process that specifies risk tolerances and the process for evaluating risks based on identified threats and the specified tolerances.	CONTROLLER_AND_PROCESSOR	32
DCF-18	Quarterly Vulnerability Scan	Pequity engages with third-party to conduct vulnerability scans of the production environment at least quarterly. Results are reviewed by management and high priority findings are tracked to resolution.	CONTROLLER_AND_PROCESSOR	32
DCF-19	Annual Penetration Tests	Pequity engages with third-party to conduct penetration tests of the production environment at least annually. Results are reviewed by management and high priority findings are tracked to resolution.	CONTROLLER_AND_PROCESSOR	32
DCF-25	Disaster Recovery Plan	Pequity has an established Disaster Recovery Plan that outlines roles and responsibilities and detailed procedures for recovery of systems.	CONTROLLER_AND_PROCESSOR	32
DCF-32	Security Policies	Pequity Management has approved security policies, and all employees accept these procedures when hired. Management also ensures that security policies are accessible to all employees and contractors.	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,24,25,32
DCF-45	Data Protection Policy	Pequity has established a Data Protection Policy and requires all employees to accept it upon hire. Management monitors employees' acceptance of the policy.	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,32
DCF-53	Cryptography Policies	Pequity has an established policy and procedures that governs the use of cryptographic controls.	CONTROLLER_AND_PROCESSOR	32
DCF-54	Customer Data is Encrypted at Rest	Pequity stores customer data in databases that is encrypted at rest.	CONTROLLER_AND_PROCESSOR	32
DCF-65	Maintains a Privacy Policy	Pequity maintains a Privacy Policy that is available to all external users and internal employees, and it details the company's confidentiality and privacy commitments.	CONTROLLER_AND_PROCESSOR	24,25
DCF-94	Physical Security	Pequity has security policies that have been approved by management and detail how physical security for the company's headquarters is maintained. These policies are accessible to all employees and contractors.	CONTROLLER_AND_PROCESSOR	32
DCF-115	Privacy Policy Inclusions	Pequity 's Privacy Policy includes: -Purpose for collecting personal information -Choice and consent -Types of personal information collected -Methods of collection (for example, use of cookies or other tracking techniques) -Use, retention, and disposal -Access -Disclosure to third parties -Security for privacy -Quality, including data subjects' responsibilities for quality -Monitoring and enforcement	PRINCIPLES,CONTROLLER_AND_PROCESSOR	7,8,24,25
DCF-117	Minimal Information Required	Pequity 's collection of personal information is limited to that necessary to meet the entity's objectives.	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,25
DCF-120	Annual Review of Purposes	Pequity 's management reviews privacy policies and procedures annually to ensure that personal information is used in conformity with the purposes identified in the privacy notice.	CONTROLLER_AND_PROCESSOR	24,25
DCF-121	Purposeful Use Only	Pequity only uses personal information for the purposes identified in the entity's privacy policy.	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,11,25
DCF-130	Tracking Breaches of PII	Pequity tracks and logs breaches involving unauthorized uses and disclosures of personal information in an incident tracking system.	CONTROLLER_AND_PROCESSOR	33
DCF-135	Notice of Breach to Affected Users	Pequity has a process for providing notice of breaches and incidents to affected data subjects to meet Pequity 's objectives related to privacy.	CONTROLLER_AND_PROCESSOR	34
DCF-159	Incident Response Plan	Pequity has an established Incident Response Policy that outlines management responsibilities and procedures to ensure a quick, effective, and orderly response to information security incidents and annual testing.	CONTROLLER_AND_PROCESSOR	32
DCF-166	Business Continuity Plan	Pequity has a defined Business Continuity Plan that outlines the proper procedures to respond, recover, resume, and restore operations following a disruption.	CONTROLLER_AND_PROCESSOR	32
DCF-169	Backup Policy	Pequity has a defined backup policy that establishes the requirements for backup information, software and systems.	CONTROLLER_AND_PROCESSOR	32
DCF-181	Encryption Policy	Pequity has a defined policy that establishes requirements for the use of cryptographic controls.	CONTROLLER_AND_PROCESSOR	32
DCF-183	Vulnerability Management	Pequity has a defined policy that establishes requirements for vulnerability assessments and reporting.	CONTROLLER_AND_PROCESSOR	32
DCF-526	Scope of Privacy Program	Pequity has a well-defined documented scope that reflects the boundaries and applicability of its Privacy Program	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,24,25,32,35
DCF-527	Designated Data Protection Official	Pequity has formally assigned an independent and capable member to manage PII-related matters.	CONTROLLER_AND_PROCESSOR	37,38,39
DCF-528	Management of Sensitive Information	Pequity maintains policies and procedures to properly identify, label and store sensitive information (e.g., PII, PHI, Cardholder Data, etc.), and to manage and document the use, transfer, storage, and disposal of physical media containing sensitive information. Personnel are trained and made aware of how to handle sensitive information and report related incidents.	CONTROLLER_AND_PROCESSOR	32
DCF-529	Data Subject Consent	Pequity has established a process to obtain consent from a data subject prior to collecting PII.	PRINCIPLES	7,8
DCF-530	Data Subject Withdrawal of Consent	Pequity has an established process for acknowledging, logging and documenting withdrawal of consent.	PRINCIPLES	7,8
DCF-531	Notification of Disclosures to Third Parties	Pequity properly reports and retains records of PII disclosures to include PII disclosed to third parties, requests for legally-binding PII disclosures, subcontractors/sub-processors used for PII processing in accordance with contractual requirements, and changes in subcontractors.	RIGHTS_OF_THE_DATA_SUBJECT,CONTROLLER_AND_PROCESSOR	19,28,29
DCF-532	International Transfer of Personal Data	Pequity has established policies and procedures (e.g. Privacy Policy) for the transfer and transmission of PII to a non-EU country or international organization.	TRANSFERS_OF_PERSONNEL_DATA_TO_THIRD_COUNTRIES_AND_INTERNATIONAL_ORGANIZATIONS	44,45,46,49
DCF-533	Joint PII Controllers	Pequity has determined roles and responsibilities for the processing of PII with joint PII controllers.	CONTROLLER_AND_PROCESSOR	26
DCF-534	Communication of Obligations to Data Subjects	Pequity communicates its obligations to data subjects in a clear and transparent manner.	PRINCIPLES,RIGHTS_OF_THE_DATA_SUBJECT,CONTROLLER_AND_PROCESSOR	11,12,13,14,24,25
DCF-535	Organizational Context	Pequity has identified its role and place in the data processing ecosystem, and has identified and documented responsibilities and expectations determined by applicable regulations, obligations, and internal and external factors, entities, and stakeholders, as they apply to its role.	PRINCIPLES,CONTROLLER_AND_PROCESSOR,TRANSFERS_OF_PERSONNEL_DATA_TO_THIRD_COUNTRIES_AND_INTERNATIONAL_ORGANIZATIONS	5,24,25,28,30,31,35,36,47,48
DCF-536	Record of Processing Activity (ROPA)	Pequity has an established and documented record of processing activity (ROPA), which includes evidence of lawful collection and use, including defined purpose of processing.	PRINCIPLES,CONTROLLER_AND_PROCESSOR	5,6,9,10,30
DCF-537	Data Processing Agreements in Place	Pequity has data processing agreements in place with data processing ecosystem parties, used for implementing appropriate measures designed to meet the objectives of Pequity 's privacy program.	CONTROLLER_AND_PROCESSOR	28,29
DCF-538	Data Protection Impact Assessment (DPIA)	Pequity conducts a data protection impact assessment when required or when planning for the processing of new, or changing the processing of existing, PII.	CONTROLLER_AND_PROCESSOR	35,36
DCF-539	Collection of PII from Special Categories	Pequity 's record of processing activity (ROPA) includes conditions for allowable collection of special categories of personal data.	PRINCIPLES	9
DCF-540	Tracking and Response to Data Subject Requests	Pequity tracks and manages requests from data subjects, and provides a response to valid requests within 30 days.	RIGHTS_OF_THE_DATA_SUBJECT	12,15,16,17,18,19,20,21,22
DCF-541	Management of Data Subject Rights	Pequity has an established processes to properly manage data subject rights.	PRINCIPLES,RIGHTS_OF_THE_DATA_SUBJECT	11,12,15,16,17,18,19,20,21,22
DCF-542	Representative for Non-EU Controllers/Processors	Pequity , which is a controller/processor not established in the EU, has designated in writing a representative in an EU member state to manage all data processing issues concerning Pequity .	CONTROLLER_AND_PROCESSOR	27