Riversys Technologies Private Limited
(Scrut Automation)

Audit Report
Based on
General Data Protection Regulation- (EU) 2016/ 679
For

Visionify Inc.
(Visionify)

Scope of services	"Solutions for Workplace Safety and Compliance"
Location from which the services are being provided	1499 W 120th Ave, Ste 110, Westminster CO 80234
Date(s) Assessment	26th September 2024
Audit Criteria	Compliance with GDPR (General Data Protection Regulation).

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Visionify Inc. (Visionify)

1499 W 120th Ave, Ste 110, Westminster CO 80234
We have examined the design and controls of **"**Visionify**"** as on 26th September 2024, against the requirements of **General Data Protection Regulation (EU) 2016/679**.

The Company's management is responsible for the adequate design of these controls and compliance with the GDPR requirements. Our responsibility is to express an opinion on the design of these controls and the Company's compliance based on our examination.

Our examination included:
(1) Interviewing Top Management, IT Administration Staff, HR Management Staff, General Administration Staff;
(2) Reviewing IT Assets;
(3) Obtaining an understanding of the design of the Company's controls over GDPR Principles;
(4) Technical and Non- technical controls adopted and Reviewing Related policies and procedures;

Because of inherent limitations, controls may not prevent, detect or correct errors or fraud which may occur. Also, projections of any evaluation of adequate design to future periods are subject to the risk that controls may become inadequate because of change in conditions, or that the degree of compliance with the policies and procedures may deteriorate.

In our opinion, as of 26th September 2024, the Company in all material respects has adequately designed controls to meet GDPR requirements.

This report is intended solely for the information and use of **Visionify** and should not be used without prior authorization of **Visionify Inc.**

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1. GDPR Background

The General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas. The GDPR's primary aim is to give control to individuals over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.[1] Superseding the Data Protection Directive 95/46/EC, the regulation contains provisions and requirements related to the processing of personal data of individuals (formally called data subjects in the GDPR) who are located in the EEA, and applies to any enterprise—regardless of its location and the data subjects' citizenship or residence—that is processing the personal information of data subjects inside the EEA.

The GDPR was adopted on 14 April 2016, and became enforceable beginning 25 May 2018.The regulation applies if the data controller (an organisation that collects data from EU residents), or processor (an organisation that processes data on behalf of a data controller like **cloud service providers**), or the data subject (person) is based in the EU. Under certain circumstances, the regulation also applies to organisations based outside the EU if they collect or process personal data of individuals located inside the EU. The regulation does not apply to the processing of data by a person for a "purely personal or household activity and thus with no connection to a professional or commercial activity.

2. GDPR Definitions

S.No	Definitions
1	**'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2	**'processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3	'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
4	**'profiling'** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic

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	situation, health, personal preferences, interests, reliability, behavior, location or movements;
5	'**pseudonymisation'** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
6	**'controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
7	**'processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
8	**'recipient'** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. 2However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients;
9	'**third party'** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
10	'**consent'** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
11	**'personal data breach'** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
12	**'genetic data'** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
13	**'biometric data'** means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
14	**'data concerning health'** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

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3. Introduction-

Registered Company Name – **Visionify Inc. (Visionify)**

4. GDPR AUDIT REPORT

GENERAL DATA PROTECTION REGULATION AUDIT CHECKLIST		
LEAD AUDITOR:	Kush Kaushik	***DIRECTIONS:***
AUDIT DATE:	26th September 2024	*1. Answer each requirement based on your current process.*
AUDIT DESCRIPTION:	Review of policy and procedure documentation to ensure alignment to GDPR.	*. Refer to the relevant GDPR Article if you need further clarification on meeting the standard or requirement (if the question relates to a specific Article, it is noted to the left of the question – those without Article references are suggested requirements or guidelines from the ICO orWP29)* *. Use the requirement number on the Action Plan where corrective actions or mitigating controls are required.*

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Chapter #	Article #	Requirements	Results/Findings	Effectiveness
I General Provisions	**Art 3. Territorial Scope**	3.1) Applies to the processing of personal data in the context of the activities of an establishment of a controller or a processor in the Union, regardless of whether the processing takes place in the Union or not.	Visionify processes personal data for the purpose of user engagement and benefits as per the agreement signed with the Controller. Verified agreement signed with Data Controllers.	No exception noted.
		3.2) This Regulation applies to the processing of personal data of data subjects who are in the Union by a controller or processor not established in the Union, where the processing activities are related to: a) the offering of goods or services, irrespective of whether a payment of the data subject is required, to such data subjects in the Union; or b) the monitoring of their behaviour as far as their behaviour takes place within the Union.	Visionify processes personal data within and outside the Union locations also, offering services for user engagement and benefits purposes.	No exception noted.
II Principles	**Art 6. Lawfulness of Processing**	Processing shall be lawful only if and to the extent that at least one of the following applies: the data subject has given consent to the processing of his or her	Visionify processes the data as per the agreement with the Controller. Privacy policy found evident via https://visionify.ai/privacy-policy/	No exception noted.

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		personal data for one or more specific purposes; processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; processing is necessary for compliance with a legal obligation to which the controller is subject; processing is necessary in order to protect the vital interests of the data subject or of another natural person; processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.		
	Article 13: Information to be Provided Where	The controller shall, at the time when personal data are obtained, provide the data subject with the	Notice of privacy served at the initial login screen of user accounts. Every Data Subject can see the purpose	No exception noted.

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	Personal Data are Collected from the Data Subject	following further information necessary to ensure fair and transparent processing: the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability; where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; the right to lodge a complaint with a supervisory authority; whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract,	and uses of their data. The process to exercise data subject rights is available in the privacy policy. To make a complaint to the Supervisory authorities, a grievance redressal mechanism is in place.	

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		as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.		
	Art 4(11). Consent, Art 7 Conditions for consent	Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her; Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.	Visionify maintain consent whatever procedure, followed by Controller and execute exercise as per direction of Controller.	No Exception Noted

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	Article 9: Conditions Applicable to Child's Consent in Relation to Information Society Services	8.1) Where point (a) of Article 6(1) applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.	Not Applicable as Visionify don't process any children data	Not Applicable
III Rights of the data subjects	**15. Right of access by the data subject.**	15.1 The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: - the purposes of the processing; - the categories of personal data concerned - where possible, the envisaged period for which the personal data will be stored, - the right to lodge a complaint with a supervisory authority;	Right to access information about personal data found evident. Data subjects can write to dpo@Visionify.ai	No Exception Noted

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		15.2 Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer. 15.3 The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. 15.4 The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.		
	Art 16. Right to rectification	The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal	Right to rectification about personal data is evident. Data subjects can write to dpo@Visionify.ai	No Exception noted

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		data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.		
	Art 17. Right to erasure ('right to be forgotten')	17.1 The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;	Right to correction and erasure of personal data is evident with Visionify. Verified Process of correction and erasure as mentioned within the privacy policy of Visionify https://visionify.ai/privacy-policy/	No Exception noted

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		c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).		

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- Technical measures to Safeguards relevant security

#	Data Processor's Control	Results/Findings	Effectiveness
1	The data processor has performed a risk assessment and based on this, implemented the technical measures considered relevant to achieve an appropriate level of security, including establishment of the safeguards agreed with the Controller.	Checked by way of inspection that formalized procedures are in place to ensure that the data processor performs a risk assessment to achieve an appropriate level of security. Checked by way of inspection that the risk assessment performed is up to date and comprises the current processing of personal data. Checked by way of inspection that the data processor has implemented the technical measures ensuring an appropriate level of security consistent with the risk assessment. Checked by way of inspection that the data processor has implemented the safeguards agreed upon with the Controller. Verified the documented DPIA and remediation plans.	No Exception Noted
2	For the systems and databases used in the processing of personal data, software to protect against malicious code and virus has been installed and that is updated on a regular basis.	Checked by way of inspection that, for the systems and databases used in the processing of personal data, software to protect against malicious code and virus has been installed. Checked by way of inspection that antivirus software is up to date.	No Exception Found

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3	External access to systems and databases used in the processing of personal data takes place through a secured firewall.	Checked by way of inspection that external access to systems and databases used in the processing of personal data takes place only through a secured firewall. Checked by way of inspection that the firewall has been configured in accordance with the relevant internal policy.	No Exception Found
4	Internal networks have been segmented to ensure restricted access to systems and databases used in the processing of personal data.	Inquired whether internal networks have been segmented to ensure restricted access to systems and databases used in the processing of personal data.	No Exception Found
5	Access to personal data is isolated to users with a work-related need for such access.	Checked by way of inspection that formalized procedures are in place for restricting users' access to personal data. Checked by way of inspection that the technical measures agreed support retaining the restriction in users' work-related access to personal data.	No Exception Found
6	For the systems and databases used in the processing of personal data, system monitoring has been established with an alarm feature. This monitoring comprises: Capacity Availability Incidents	Checked by way of inspection that, for systems and databases used in the processing of personal data, system monitoring has been established with an alarm feature.	No Exception Found

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7	Logging has been established in systems, databases and networks	Checked by way of inspection that formalized procedures exist for setting up logging of user activities in systems, databases or networks that are used to process and transmit personal data, including review of and follow-up on logs. Checked by way of inspection that user activity data collected in logs are protected against manipulation or deletion.	No Exception Found
8	The technical measures established are tested on a regular basis in vulnerability scans and penetration tests.	Checked by way of inspection that formalized procedures exist for regularly testing technical measures, including for performing vulnerability scans and penetration tests. Checked by way of inspection of samples that documentation exists regarding regular testing of the technical measures established.	No Exception Found
9	Changes to systems, databases or networks are made consistently with procedures established that ensure maintenance using relevant updates and patches, including security patches.	Checked by way of inspection that formalized procedures exist for handling changes to systems, databases or networks, including handling of relevant updates, patches and security patches.	No Exception Found

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10	A formalized procedure is in place for granting and removing users' access to personal data. Users' access is reconsidered on a regular basis, including the continued justification of rights by a work-related need.	Checked employees' access to systems and databases to ensure that the access granted is authorized and that a work-related need exists. Verified that access for resigned or dismissed employees was deactivated or removed on a timely basis.	No Exception Found
11	Systems and databases processing personal data that involve a high risk for the data subjects are accessed as a minimum by using two-factor authentication.	Checked by way of inspection that formalized procedures exist to ensure that two-factor authentication is applied in the processing of personal data that involves a high risk for the data subjects.	No Exception Found
12	Physical access safeguards have been established so as to only permit physical access by authorized persons to premises and data centers at which personal data are stored and processed.	Checked by way of inspection of documentation that, throughout the assurance period, only authorized persons have had physical access to premises and data centers at which personal data are stored and processed.	No Exception Found
13	Each processor and, where applicable, the processor's representative shall maintain a record of all categories of processing activities carried out on behalf of a controller, containing: the name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller's or the processor's representative, and the data protection officer; the categories of processing carried out on behalf of each controller; where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers	Checked by way of Inspection that ROPA has been documented and Kept up to date with processes involving data processing activities.	No Exception Noted

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	referred to in the second subparagraph of Article 49 [EU GDPR], the documentation of suitable safeguards; where possible, a general description of the technical and organisational security measures referred to in Article 32 ([EU GDPR].		

#	Data Processor's Control	Results/Findings	Effectiveness
1	Management of the data processor has approved a written information security policy that has been communicated to all relevant stakeholders, including the data processor's employees. The IT security policy is based on the risk assessment performed.	Inspection of documentation that the information security policy has been communicated to relevant stakeholders, including the data processor's employees. The policies are shared to Visionify employees internally via GRC tool.	No Exception Found
2	Management of the data processor has checked that the information security policy does not conflict with data processing agreements entered into.	Inspection of a sample data processing agreements of Visionify and verified that the requirements in these agreements are covered by the requirements of the information security policy for safeguards and security of processing.	No Exception Found
3	The employees of the data processor are screened as part of the employment process. Such screening comprises, as relevant: - Multiple interviews; - References from former employers;	Inspection of a sample of background verification checks, that the requirements therein for screening employees are covered by the data processor's screening procedures.	No Exception Found
4	Upon appointment, employees sign a confidentiality agreement. In addition, the employees are introduced to the information security policy and procedures for data processing as well as any other relevant information regarding the employees' processing of personal data	Checked that employees appointed during the assurance period have signed a confidentiality agreement. Checked that employees appointed during the assurance period have been introduced to: - Information security policy; -	No Exception Found

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		Procedures for processing data and other relevant information.	
5	For resignations or dismissals, the data processor has implemented a process to ensure that users' rights are deactivated or terminated, including that assets are returned.	Checked by way of inspection of employees resigned or dismissed during the assurance period that rights have been deactivated or terminated and that assets have been returned.	No Exception Found
6	Awareness training is provided to the data processor's employees on a regular basis with respect to general IT security and security of processing related to personal data.	Checked by way of inspection that the data processor provides awareness training to the employees via GRC platform covering general IT security and security of processing related to personal data. Inspected documentation that all employees who have either access to or process personal data have completed the GDPR privacy awareness training provided.	No Exception Found

- Representatives of controllers or processors not established in the Union.

#	Data Processor's Control	Results/Findings	Effectiveness
1	1. The representative shall be established in one of those Member States where the data subjects are and whose personal data are processed in relation to the offering of goods or services to them, or whose behaviour is monitored. 2. This obligation shall not apply to: a. processing which is occasional, does not include, on a large scale, processing of special categories of data as referred to in Article 9(1)[EU GDPR] or processing of personal data relating to criminal convictions and offences referred to in Article 10, and is unlikely to result	Visionify presently is operating in US. Visionify has appointed an EU Representative to address all issues related to processing, for the purposes of ensuring compliance with this Regulation.	No Exception Found

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	in a risk to the rights and freedoms of natural persons, taking into account the nature, context, scope and purposes of the processing; or b. a public authority or body. 3. The representative shall be mandated by the controller or processor to be addressed in addition to or instead of the controller or the processor by supervisory authorities and data subjects, on all issues related to processing, for the purposes of ensuring compliance with this Regulation.		

- Transfer to third party countries or international organization.

#	Data Processor's Control	Results/Findings	Effectiveness
1	Written procedures exist which include a requirement that the data processor must only transfer personal data to third countries or international organizations in accordance with the agreement with the data Controllers by using a valid basis of transfer.	Inspected that assessments are made on a regular basis – and at least once a year – as to whether the procedures should be updated.	No Exception Found

- Deleting or returning personal data

#	Data Processor's Control	Results/Findings	Effectiveness
1	Written procedures exist which include a requirement that personal data must be stored and deleted in accordance with the agreement with the data Controllers. Assessments are made on a regular basis – and at least once a year – as to whether the procedures should be updated.	Checked by way of inspection that formalized procedures are in place for storing and deleting personal data in accordance with the agreement with the data Controllers. Checked by way of inspection that the procedures are up to date.	No Exception Found

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2	The following specific requirements have been agreed with respect to the data processor's storage periods and deletion routines: • Agreements on retention periods for backup are stated in service agreements with customers. Additional deletion is only performed upon instruction from the customer.	Inspected that backup is stored according to agreed retention periods and that changes in backup are handled through the change management process. Retention of information is mentioned within the privacy policy of Visionify	No Exception Found
	Upon termination of the processing of personal data for the data Controllers, data have, in accordance with the agreement with the data Controllers, been: • Returned to the data Controllers; and/or • Deleted if this is not in conflict with other legislation.	Checked by way of inspection that formalized procedures are in place for processing the data Controllers's data upon termination of the processing of personal data. Checked that terminated data processing sessions during the assurance period that documentation exists that the agreed deletion or return of data has taken place.	No Exception Found

- Responding to Data Breach

#	Data Processor's Control	Results/Findings	Effectiveness
1	Written procedures exist, which include a requirement that the data processor must inform the data Controllers in the event of any personal data breaches. Assessments are made on a regular basis, and at least once a year, to determine whether the procedures should be updated.	Checked by way of inspection that formalized procedures are in place, which include a requirement to inform the data Controllers in the event of any personal data breaches. Checked by way of inspection that procedures are up to date.	No Exception Noted
2	The data processor has established the following controls to identify any personal data breaches: awareness of employees, monitoring of network traffic, follow-up on logging of access to personal data, and an	Checked by way of inspection that the data processor provides awareness training to employees in identifying any personal data	No Exception Noted

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	agreement with a third party for assistance in handling security incidents.	breaches. Checked by way of inspection of documentation that network traffic is monitored and that anomalies, monitoring alarms, large file transfers, etc., are followed up on.	
3	In the event of a personal data breach, the data processor notified the data controller without undue delay and no later than 72 hours after becoming aware of the breach, whether it occurred at the processor or a sub-processor, in accordance with GDPR requirements.	Inspected the Procedure is in place to communicate to the relevant data controllers without undue delay and no later than 72 hours after the data processor became aware of the incidents, in compliance with GDPR requirements. There have not been any data breachesc till date.	No Exception Noted
4	The data processor has implemented procedures to assist the data controller in ensuring compliance with the obligation to notify personal data breaches, which include: • The nature of the personal data breach • The likely consequences of the personal data breach • The measures taken or proposed to address the personal data breach	Checked by way of inspection that the procedures established for notifying the data controllers in the event of any personal data breach include detailed steps for: • Describing the nature of the personal data breach • Outlining the likely consequences of the personal data breach • Detailing the measures taken or proposed to address the personal data breach	No Exception Noted

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TO BE COMPLETED BY THE AUDITOR

Have all questions been completed? Yes

Print Name: Kush Kaushik

AUDIT REPORT SUMMARY

Visionify Inc. (Visionify) working as a Processor is found to have effectively implemented the requirements of GDPR. Required security policies and practices found to be documented and implemented.

PII being processed is non sensitive in nature and presently the required GDPR practices as controller are available and are well adopted by **Visionify Inc. (Visionify)**

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