



COMPONENTS EXPRESS, INC.

[www.ComponentsExpress.com](http://www.ComponentsExpress.com)

---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

# **Components Express, Inc.**

## **General Data Protection Regulation (GDPR)**

### **Compliance Statement**

December 1, 2019

10330 ARGONNE WOODS DRIVE, SUITE 100  
WOODRIDGE, IL 60517-4995  
TEL 630-257-0605 / 800-578-6695 (Outside Illinois) FAX 630-257-0603



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

**General Statement** – This intent of this document is to provide an evidence of our internal efforts to comply with all statutory and regulatory requirements of GDPR as it pertains to our ISO requirements. As a management team we recognize the need to remain in compliance and have made a concerted effort to do so. Our review internal review with the assistance of external independent consultants has resulted in the compliance measures that are outlined in the body of this document. It is our intent to monitor any changes in regulatory requirements and or changes in our business model and re-evaluate compliance requirements as needed

### **General Exposure**

**EU Financial Transaction Review** – Review any direct financial transaction with EU entities that fall under GDPR protections.

Compliance Measures - There are not any GDPR statutory or regulatory requirements that apply to any company to company transaction that we have with EU/EEA based distributors.

**Credit Card information** – All measures in place to comply with any storage of credit card details or transaction history that fall under GDPR protections.

Compliance Measures – We do not keep or store any credit card information for individuals in the EU/EEA.

We have not identified any GDPR articles have no statutory or regulatory requirements that relate to our activities as it pertains to credit card transactions.

**Processing customer requirements documentation (Proprietary data / Intellectual Property)** – All current measures in place to comply with any requirements under GDPR to protect customers proprietary data and intellectual property.

Compliance Measures - Under GDPR Organizations that have at least 250 employees or conduct higher-risk data processing are required to keep an up-to-date and detailed list of their processing activities and be prepared to show that list to regulators upon request.

We have fewer than 250 employees and do not conduct any high risk data processing. Therefore we do not conduct the data protection impact assessment as required under GDPR to demonstrate compliance.



## **Specific ISO9001:2015 Compliance Exposure**

### **5.1.2 Leadership**

**Customer Focus** - Top management shall demonstrate leadership and commitment with respect to customer focus by ensuring that:

- a) Customer and applicable statutory and regulatory requirements are determined, understood and consistently met;
- b) The risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed;
- c) The focus on enhancing customer satisfaction is maintained.

Compliance Measures - Our management team has reviewed the GDPR statutory and regulatory requirements and has identified any requirements that are relevant to our business and its business relationships within the European Union. We understand these requirements and have incorporated operational processes and or procedures as appropriate to ensure that the requirements are consistently met. GDPR specifically addresses personal data with respect to individuals. Any proprietary data to include intellectual property of business entities is not covered under this regulation. However, CEI does deploy business practices to secure and protect this data.

### **7.5 Documented information**

#### **7.5.1 Documented Information General**

The organization's quality management system shall include:

- a) Documented information required by this International Standard;
- b) Documented information determined by the organization as being necessary for the effectiveness of the quality management system.



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

NOTE - The extent of documented information for a quality management system can differ from one organization to another due to: the size of organization and its type of activities, processes, products and services; the complexity of processes and their interactions; the competence of persons.

Compliance Measures - There are no ISO 9001:2015 requirements that trigger any statutory or regulatory compliance under current GDPR. Any documentation created for the purpose of GDPR compliance will not contain any personal information of individuals residing within the EU/EAA.

#### **7.5.3.2 Documented information - Control of Documented Information**

For the control of documented information, the organization shall address the following activities, as applicable:

- a) Distribution, access, retrieval and use;
- b) Storage and preservation, including preservation of legibility;
- c) Control of changes (e.g. version control);
- d) Retention and disposition.

Compliance Measures – There are not any specific ISO 9001:2015 requirements that present any statutory or regulatory compliance under current GDPR. We follow our internal business processes for documenting GDPR compliance, securing the documents, maintaining the documents and providing access as required.

### **8.2 Requirements for products and services**

#### **8.2.1 Requirements for products and services - Customer Communication**

Communication with customers shall include:

- a) Providing information relating to products and services;
- b) Handling enquiries, contracts or orders, including changes;



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

### **8.2.1 Requirements for products and services - Customer Communication - (continued)**

- c) Obtaining customer feedback relating to products and services, including customer complaints;
- d) Handling or controlling customer property;
- e) Establishing specific requirements for contingency actions, when relevant.

Compliance Measures – There are not any statutory or regulatory requirements under GDPR that obligate CEI to establish any specific compliance measures. Communications related to products and services, inquiries, contracts or orders do not contain any personal information of individuals in the EU/EEA.

### **8.2.2 Requirements for products and services - Determining the requirements for products and services**

When determining the requirements for the products and services to be offered to customers, the organization shall ensure that:

- a) The requirements for the products and services are defined, including:
  - 1. Any applicable statutory and regulatory requirements;
  - 2. Those considered necessary by the organization;
- b) The organization can meet the claims for the products and services it offers.

Compliance Measures - There are not any statutory or regulatory requirements under GDPR that obligate CEI to employ any compliance measures. There were no articles found in GDPR that pertained to an organizations ability to meet the claims of products or services sold to individuals. We will continue to follow our existing ISO 9001:2015 complaint processes with no modifications specific to GDPR.

### **8.2.3.2 The organization shall retain documented information, as applicable:**

- a) On the results of the review;
- b) On any new requirements for the products and services.



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

Compliance Measures - There are not any statutory or regulatory requirements under GDPR that obligate CEI to employ any compliance measures. There were no articles found in GDPR that pertained to an organizations ability to meet the claims of products or services sold to individuals. We will continue to follow our ISO 9001:2015 complaint processes with no modifications specific to GDPR.

#### **8.4 Control of externally provided processes, products and services**

##### **8.4.1 Control of externally provided processes, products and services - General**

The organization shall ensure that externally provided processes, products and services conform to requirements.

The organization shall determine the controls to be applied to externally provided processes, products and services when:

- a. Products and services from external providers are intended for incorporation into the organization's own products and services;
- b. Products and services are provided directly to the customer(s) by external providers on behalf of the organization;
- c. A process, or part of a process, is provided by an external provider as a result of a decision by the organization.

The organization shall determine and apply criteria for the evaluation, selection, monitoring of performance, and re-evaluation of external providers, based on their ability to provide processes or products and services in accordance with requirements. The organization shall retain documented information of these activities and any necessary actions arising from the evaluations.

Compliance Measures - We do not currently source processes, products or services from EU/EAA external parties. There are no statutory or regulatory requirements under GDPR that obligate us to employ any compliance measures. There were no articles found in GDPR that pertained to externally provided products intended for the incorporation into the organizations products and services. We will continue to follow our ISO 9001:2015 complaint processes with no modifications specific to GDPR.

To the extent that we use distributors based in the EU that may deal with personal information as defined under the GDPR, we will comply with the statutory and regulatory requirement to maintain data processing agreements as required under GDPR article 28 Section 3.



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

#### **8.4.3 Control of externally provided processes, products and services - Information for external providers**

The organization shall ensure the adequacy of requirements prior to their communication to the external provider.

The organization shall communicate to external providers its requirements for:

- a. The processes, products and services to be provided;
- b. The approval of:
  1. Products and services;
  2. Methods, processes and equipment;
  3. The release of products and services;
- c. Competence, including any required qualification of persons;
- d. The external providers' interactions with the organization;
- e. Control and monitoring of the external providers' performance to be applied by the organization;
- f. Verification or validation activities that the organization, or its customer, intends to perform at the external providers' premises.

Compliance Measures - We do not use EU/EAA suppliers for products. To the extent that we use distributors based in the EU that may deal with personal information as defined under the GDPR, will comply with the statutory and regulatory requirement to maintain data processing agreements as required under GDPR article 28 Section 3.



---

*Offering complete solutions for all your cabling, networking and electronic component requirements*

## **Appendix A: Creatio Customer Relationship Management Platform Description and Diagram**

The application is deployed on cloud data center servers (Amazon, Azure) managed by Creatio. All application server part is stored in the data centers and administrated by Creatio employees. All issues related to administration, speed, or scalability are handled by Creatio. The customers only use the client part of the application.

Cloud deployment provides the following:

- Timely updates.
- Maximal performance.
- Compliance with industry standards on data availability and security.

Data on the physical storage layer, Creatio's database stores and manages all customer data, application settings, metadata, and user authentication data. Creatio is a DBMS-independent platform with its ORM. This makes any Creatio solution compatible with any supported DBMS. Right now, Creatio supports Microsoft SQL Server, Oracle, and PostgreSQL. Redis DB is used for quick in-memory storage and exchange for session data, frequently used caches, and quick interactions between nodes in a web-farm.

Middleware:

There is a secure middleware server running on the Microsoft Virtual Server platform located in the corporate data center. The functions of this middleware sever are:

- To receive lead information collected in the web portal via a firewall secured path.
- Post the leads into the Creatio database via a secured web connection

User access is made through web or mobile clients. All access is:

- Via encrypted session
- Password Authenticated with password minimum strength requirements
- Administrative access is limited to designated staff
- Access activity is logged for any needed review





*Offering complete solutions for all your cabling, networking and electronic component requirements*

