

## **General Data Protection Regulation**

### **Aetna's approach to compliance**

#### **Overview**

**General Data Protection Regulation "GDPR" represents new EU legislation that applies to organisations that handle the personal data of EU residents. It will apply across Europe and in the UK from 25 May 2018, and will replace the UK's Data Protection Act 1998.**

**Although it is EU legislation, UK organisations will need to comply, given that the UK will still be part of the EU until we negotiate our exit.**

**Following our departure from the EU, the UK is likely to adopt separate data protection legislation that aligns with the GDPR. It is envisaged that this will be substantively similar to the GDPR to facilitate trade, and allow for the free movement of personal data, between the UK and EU.**

#### **What is Aetna's approach to compliance with the regulation?**

- The precise nature of the impact that the GDPR is likely to have on Aetna is currently being assessed.
- Any impact will, to some degree, depend on the outcome of the UK's exit negotiations with the EU and the data protection regime that will emerge following Brexit.
  - In any event, the GDPR essentially reinforces privacy principles which have been in place for decades, so it is not an entirely new framework.
  - What has changed is that many businesses, even those which started life as brick and mortar operations, are continuously increasing their digital footprint and are considerably more data driven.
- This has led to a paradigm shift in the relevance of data to both our and our customers' businesses. The GDPR's aim is to update existing frameworks such as the EU Data Protection Directive in order to reflect this new reality.
- Aetna has already embedded the key principles mandated by the EU Data Protection Directive and other laws and regulations into its processes and operations.
  - We are therefore confident that we already comply or are close to complying with many GDPR requirements.
  - We are also in the process of undertaking a gap analysis to identify areas where additional work will be required to ensure compliance.