

GDPR Report on Compliance

Report on Compliance, as defined by the General Data Protection Regulation (GDPR) law

Management's controls to address requirements of the core GDPR articles, principles and rights published by the European Parliament, Council of the European Union and covering EU privacy law and human rights laws for residents of the EU

As of a Point in Time, April 15, 2025

Together with Independent Accountant's Report

Report on Management's Description of



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Section I

INDEPENDENT ACCOUNTANT'S REPORT

Independent Accountant's Report

To the Management of Manson Western, LLC dba Western Psychological Services:

We have examined management of Manson Western, LLC dba Western Psychological Services' System assertion, included in this report, that Manson Western, LLC dba Western Psychological Services complied with the specified requirements as defined by the General Data Protection Regulation (GDPR), as of June 21, 2024.

Manson Western, LLC dba Western Psychological Services management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion about Manson Western, LLC dba Western Psychological Services' compliance with the specified requirements, based on our examination.

The detailed procedures and results of testing are enumerated in Appendix A, GDPR Articles Controls Testing and Results. In instances where article controls are not applicable, they are labeled as such in the results of procedures column.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion about compliance with the specified requirements is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertions. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination does not provide a legal determination of Manson Western, LLC dba Western Psychological Services' compliance with the specified requirements.

In our opinion, management's assertion that Manson Western, LLC dba Western Psychological Services complied with the GDPR articles requirements listed in Appendix A, as of April 15, 2025 is fairly stated, in all material respects.

Johanson Group LLP

Colorado Springs, Colorado
May 19, 2025



Section II

ASSERTION OF MANSON WESTERN, LLC DBA WESTERN
PSYCHOLOGICAL SERVICES MANAGEMENT

Manson Western, LLC dba Western Psychological Services Management Assertion

We have evaluated the specific requirements as defined by the General Data Protection Regulation (GDPR) – an EU privacy law effective 25 May 2018 and published by the European Parliament, Council of the European Union, as of June 21, 2024 and as implemented by Manson Western, LLC dba Western Psychological Services.

1. We are responsible for selecting the GDPR required criteria and how Manson Western, LLC dba Western Psychological Services complies with the requirements applicable to its activities. That responsibility encompasses the following:
 - a. Identifying applicable compliance requirements relevant to Manson Western, LLC dba Western Psychological Services activities.
 - b. Determining the types of services provided by Manson Western, LLC dba Western Psychological Services including, as appropriate, the classes of transactions and data processed that are impacted by the requirements.
 - c. Determining how Manson Western, LLC dba Western Psychological Services systems capture and address significant events and conditions, other than transactions.
 - d. Implementing processes and procedures to address the requirements of GDPR.
 - e. Identifying other aspects of our control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring controls that are relevant to processing and reporting transactions.
 - f. Establishing and maintaining internal controls to provide reasonable assurance that Manson Western, LLC dba Western Psychological Services complies with those requirements.
 - g. Evaluating and Manson Western, LLC dba Western Psychological Services compliance with the GDPR requirements.
 - h. Determining legal, regulatory, or contractual requirements and Manson Western, LLC dba Western Psychological Services compliance with those requirements.
2. We confirm, to the best of our knowledge and belief that we have complied with relevant GDPR requirements as of a point in time, April 15, 2025. The criteria we used in making this assertion were that:
 - a. The risks that threaten compliance with GDPR by Manson Western, LLC dba Western Psychological Services have been identified by management.
 - b. The controls identified by management as responses to the requirements of the GDPR requirements, if operating would provide reasonable assurance of the achievement of such compliance.



Manson Western, LLC dba Western Psychological Services Management
May 19, 2025



Appendix A

GDPR Articles Controls Testing and Results

Appendix A – GDPR Articles Controls Testing and Results

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
Chapter 1 General Provisions			
GDPR 1.1 - Privacy Policy	The organization has a privacy policy published on its website, which outlines privacy obligations and specifies data subject rights in accordance with applicable laws and regulations. The policy is reviewed by management on an annual basis.	Inspected Western Psychological Services' Privacy Policy to determine that the organization has a policy published on its website, which outlines privacy obligations and specifies data subject rights in accordance with applicable laws and regulations. The policy is reviewed by management on an annual basis.	Control determined to be suitably designed.
GDPR 1.2 - Employee Privacy Notice	The organization has established a privacy notice for its employees and contractors, which specifies their rights and the organization's privacy obligations in accordance with applicable privacy laws and regulations. The policy has been communicated and acknowledged by the employees and contractors on at least an annual basis or during significant changes.	Inspected Western Psychological Services' Internal Privacy Policy to determine that the organization has established a privacy notice for its employees and contractors, which specifies their rights and the organization's privacy obligations in accordance with applicable privacy laws and regulations. The policy has been communicated and acknowledged by the employees and contractors on at least an annual basis or during significant changes.	Control determined to be suitably designed.
GDPR 1.3 - Data Protection Policy	The Data Protection policy is established and communicated to employees and contractors within the organization. The policy is reviewed by management on an annual basis or in case of significant changes.	Inspected Western Psychological Services' Data Protection Impact Assessment Policy to determine that the policy is established and communicated to employees and contractors within the organization. The policy is reviewed by management on an annual basis or in case of significant changes.	Control determined to be suitably designed.
Chapter 2 Principles			
GDPR 2.1 - Data Subject Rights Procedure	The organization has established a data subject rights procedure that specifies rights granted to individuals with respect to their personal data. These procedures are approved by	Inspected Western Psychological Services' Data Subject Rights Policy and Procedure to determine that the organization has established a procedure that specifies rights granted to individuals with respect to their personal data. These procedures are approved by management and	Control determined to be suitably designed.

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
	management and communicated to employees and contractors.	communicated to employees and contractors.	
GDPR 2.2 - Access Requests from Data Subjects	Access requests from data subjects to obtain, amend, or review their personal information are documented, retained, and acted upon within 30 days from the receipt of the request. Any denial on request is communicated to data subjects and handled in accordance with applicable privacy regulations.	Inspected Western Psychological Services' access request form to determine that the requests from data subjects to obtain, amend, or review their personal information are documented, retained, and acted upon within 30 days from the receipt of the request. Any denial on request is communicated to data subjects and handled in accordance with applicable privacy regulations.	Control determined to be suitably designed.
GDPR 2.3 - Request for Erasure of Personal Information	Access requests from data subjects for the erasure of their personal information are documented, retained, and acted upon without undue days. Such requests are communicated to third parties that are involved in the processing of personal information in a timely manner.	Inspected Western Psychological Services' access erasure request to determine that the requests from data subjects for the erasure of their personal information are documented, retained, and acted upon without undue days. Such requests are communicated to third parties that are involved in the processing of personal information in a timely manner.	Control determined to be suitably designed.
GDPR 2.4 - Right of Data Portability	Access requests from data subjects for transmission of their personal information to another controller in a structured format are documented, retained, and acted upon without undue days.	Inspected Western Psychological Services' Data Subject Rights Policy and Procedure to determine that the access requests from data subjects for transmission of their personal information to another controller in a structured format are documented, retained, and acted upon without undue days.	Control determined to be suitably designed.
GDPR 2.5 - Request for Restriction/Objection on Processing	Access requests from data subjects for restriction or objection on processing of their personal information are documented, retained, and acted upon without undue days. Any such request is communicated to other data controllers	Inspected Western Psychological Services' Data Subject Rights Policy and Procedure to determine that access requests from data subjects for restriction or objection on processing of their personal information are documented, retained, and acted upon without undue days. Any such request is communicated to other data controllers or vendors also	Control determined to be suitably designed.

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
	or vendors also processing that information in a timely manner.	processing that information in a timely manner.	
GDPR 2.6 - Consent on Collection and Processing	Explicit consent is obtained and maintained from data subjects prior to collection and for any new uses or disclosures of their personal information. Data subjects are provided with a mechanism to modify or withdraw their consent.	Inspected Western Psychological Services' explicit consent to determine that it is obtained and maintained from data subjects prior to collection and for any new uses or disclosures of their personal information. Data subjects are provided with a mechanism to modify or withdraw their consent.	Control determined to be suitably designed.
GDPR 2.7 - Withdrawal of Consents	The organization responds promptly to data subjects' requests to modify or withdraw their consent at any time. Records of such requests are documented and retained in accordance with organizational policies.	Inspected Western Psychological Services' consent log to determine that the organization responds promptly to data subjects' requests to modify or withdraw their consent at any time. Records of such requests are documented and retained in accordance with organizational policies.	Control determined to be suitably designed.
GDPR 2.8 - Request on Data Subject Rights	Requests received from controllers regarding exercising rights of data subjects are documented, retained, and acted upon without undue days.	Inspected Western Psychological Services' data subject rights request to determine that the requests received from controllers regarding exercising rights of data subjects are documented, retained, and acted upon without undue days.	Control determined to be suitably designed.
Chapter 3 Rights of the data subject			
GDPR 3.1 - Lawfulness of Processing	Organization determines, documents, and complies with the relevant lawful basis for the processing of personal data for the identified purposes in accordance with applicable privacy obligations.	Inspected Western Psychological Services' signed privacy commitments to determine that the organization determines, documents, and complies with the relevant lawful basis for the processing of personal data for the identified purposes in accordance with applicable privacy obligations.	Control determined to be suitably designed.
GDPR 3.2 - Record of Processing Activities/Inventory	Organization maintains a record of processing activities with respect to personal data collected from data subjects or processed	Inspected Western Psychological Services' records of processing activities to determine that the organization maintains a record of processing activities with respect to personal data collected from	Control determined to be suitably designed.

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
	on behalf of the controller. The documented inventory is reviewed by management on at least an annual basis and provided to legal authorities on request.	data subjects or processed on behalf of the controller. The documented inventory is reviewed by management on at least an annual basis and provided to legal authorities on request.	
GDPR 3.3 - Processing Special Categories of Personal Data	The organization maintains an inventory of special categories of personal data processed by the organization, as well as its purpose. The documented inventory is reviewed by management on at least an annual basis and provided to legal authorities on request.	Inspected Western Psychological Services' records of processing activities to determine that the organization maintains an inventory of special categories of personal data processed by the organization, as well as its purpose. The documented inventory is reviewed by management on at least an annual basis and provided to legal authorities on request.	Control determined to be suitably designed.
GDPR 3.4 - Retention of Personal Information	The organization retains personal information consistent with its privacy commitments and as long as it is required for its intended purpose.	Inspected Western Psychological Services' Data Retention and Disposal Policy to determine that the organization retains personal information consistent with its privacy commitments and as long as it is required for its intended purpose.	Control determined to be suitably designed.
GDPR 3.5 - Data Protection Impact Assessment	The organization assesses the need for and implements, where appropriate, a data protection impact assessment whenever new processing of personal data or changes to existing processing is planned.	Inspected Western Psychological Services' Privacy Impact Assessment Report to determine that the organization assesses the need for and implements, where appropriate, a data protection impact assessment whenever new processing of personal data or changes to existing processing is planned.	Control determined to be suitably designed.
GDPR 3.6 - Awareness Training	Employees and contractors are required to complete an information security and privacy awareness training as part of the onboarding process and annually thereafter.	Inspected Western Psychological Services' security awareness training to determine that the employees and contractors are required to complete an information security and privacy awareness training as part of the onboarding process and annually thereafter.	Control determined to be suitably designed.
Chapter 4 Controller and Processor			
GDPR 4.1 - Contracts with Processors	Organization maintains written contract with processors that it uses	Inspected Western Psychological Services' non-disclosure agreement to determine that the organization	Control determined to be suitably designed.

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
	for processing personal data collected from data subjects. These contracts outline the security and privacy requirements that are required to be implemented by processors for the protection of personal data.	maintains a written contract with processors that it uses for processing personal data collected from data subjects. These contracts outline the security and privacy requirements that are required to be implemented by processors for the protection of personal data.	
GDPR 4.2 - Contracts with Controller	Organization maintains written contract with controllers on behalf of whom it performs processing of personal data. These contracts outline the security and privacy requirements that are required to be implemented by processors for the protection of personal data.	Inspected Western Psychological Services' non-disclosure agreement to determine that the organization maintains a written contract with the controllers on behalf of whom it performs processing of personal data. These contracts outline the security and privacy requirements that are required to be implemented by processors for the protection of personal data.	Control determined to be suitably designed.
GDPR 4.3 - Authorization from Controller for Sub-Processing	Organization obtains formal authorization from the controller prior to engaging another processor (sub-processor) to support its processing activities. Arrangements between processor and sub-processors are supported by written contracts outlining the same data protection obligations as it has with the controller.	Inspected Western Psychological Services' sub-processor agreements to determine that the organization obtains formal authorization from the controller prior to engaging another processor (sub-processor) to support its processing activities. Arrangements between the processor and sub-processors are supported by written contracts outlining the same data protection obligations as it has with the controller.	Control determined to be suitably designed.
GDPR 4.4 - Vendor Management Process	A vendor management process has been implemented whereby management performs risk assessments of potential new vendors/ processors and evaluates the compliance of existing vendors (including processors) on an annual basis.	Inspected Western Psychological Services' Vendor Management Policy to determine that a vendor management process has been implemented whereby management performs risk assessments of potential new vendors/ processors and evaluates the compliance of existing vendors (including processors) on an annual basis. Corrective actions are taken as required based on the results of	Control determined to be suitably designed.

Criterion	Description of Manson Western, LLC dba Western Psychological Services' Controls	Service Auditor Test of Controls	Results of Service Auditor Test of Controls
	Corrective actions are taken as required based on the results of the assessments.	the assessments.	
Chapter 5 Transfers of personal data to third countries or international organizations			
GDPR 5.1 - Breach Risk Assessments	Data breach risk assessment is performed on the identified incidents following the discovery of a breach to determine the probability that personal data has been compromised and whether notifications are required.	Inspected Western Psychological Services' data breach risk assessment to determine that it is performed on the identified incidents following the discovery of a breach to determine the probability that personal data has been compromised and whether notifications are required.	Control determined to be suitably designed.
GDPR 5.2 - Breach Notifications to Data Subjects	Notifications are provided to data subjects regarding their personal data breach without unreasonable delay in cases where a personal data breach is likely to result in a high risk to their rights and freedoms.	Inspected Western Psychological Services' Breach Notification Policy and Procedure to determine that notifications are provided to data subjects regarding their personal data breach without unreasonable delay in cases where a personal data breach is likely to result in a high risk to their rights and freedoms.	Control determined to be suitably designed.
GDPR 5.3 - Breach Notifications to Supervisory Authority	Notifications are provided to supervisory authorities regarding personal data breaches without unreasonable delay and in no case later than 72 hours after the discovery of a breach.	Inspected Western Psychological Services' Breach Notification Policy and Procedure to determine that notifications are provided to supervisory authorities regarding personal data breaches without unreasonable delay and in no case later than 72 hours after the discovery of a breach.	Control determined to be suitably designed.
GDPR 5.4 - Breach Notifications to Controller	Notifications are provided to the controller(s) regarding personal data breaches without unreasonable delay following the discovery of a breach. Data breaches are logged, tracked, and resolved in a timely manner in accordance with organizational policies and procedures.	Inspected Western Psychological Services' Breach Notification Policy and Procedure to determine that notifications are provided to the controller(s) regarding personal data breaches without unreasonable delay following the discovery of a breach. Data breaches are logged, tracked, and resolved in a timely manner in accordance with organizational policies and procedures.	Control determined to be suitably designed.

Description of Manson Western, LLC dba Western Psychological Services' Controls			
Criterion		Service Auditor Test of Controls	Results of Service Auditor Test of Controls
<i>Chapter 6 Independent supervisory authorities</i>			
GDPR 6.1 - Security Measures and Assessments	Appropriate technical and organizational measures have been implemented by the organization for the security and protection of personal information. These measures are assessed by management on an annual basis, and deficiencies identified are remediated in a timely manner.	Inspected Western Psychological Services' control monitoring to determine that appropriate technical and organizational measures have been implemented by the organization for the security and protection of personal information. These measures are assessed by management on an annual basis, and deficiencies identified are remediated in a timely manner.	Control determined to be suitably designed.