

# DATA PROTECTION POLICY

Our Data Protection Policy refers to our commitment to treat the information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. This Policy ensures that we gather, store and handle data fairly and transparently and respect individuals' rights. This information includes any data that makes a person identifiable, such as names, addresses, usernames and passwords, photographs, social security numbers, financial data, etc. Our company transparently collects this information only with the full cooperation and knowledge of interested parties.

## Scope

This Policy forms a statement of the principles that guide our daily operations and establishes how we expect Management, employees, service providers, clients, visitors and Company representatives to act in accordance with the law and applicable Company policies, procedures and guidelines.

This Policy does not discriminate at any level and applies *equally to all* company associates.

## Guidelines

The following basic principles should be followed:

Our data will be:

- Accurate and kept up-to-date.
- Collected fairly, lawfully and for legitimate purposes only.
- Processed by the company within its legal and moral boundaries.
- Protected against any unauthorised or illegal access by internal or external parties.

Our data will:

- Be communicated formally.
- Be stored for the period necessary to perform the company's legitimate business.
- Be transferred to organisations or countries that have adequate data protection policies.
- Not be distributed to any party other than the ones agreed upon by the data owner (exempting legitimate requests from legal enforcement authorities).

In addition to ways of handling the data, the company has direct obligations toward individuals to whom the data belongs. Specifically, we shall:

- Let them know which of their data is collected.
- Inform them of how we will process their data.
- Inform them about who has access to their information.
- Have safeguards in case of lost, corrupted or compromised data.
- Allow them to request that we modify, erase, reduce or correct data contained in our databases.

To exercise data protection, we are committed to the following:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in privacy and security measures.
- Ensure secure networks are in place to protect online data from cyberattacks.
- Establish clear procedures for reporting privacy breaches or data misuse.
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation, etc.).

## Responsibility

Company management and Masters are accountable for ensuring that the standards set forth by this Policy are communicated and that their conduct sets a good example.

## Violations

Adherence is mandatory, and any violation of this Policy and associated documented procedures may lead to disciplinary action or legal consequences.

## Continuous Improvement

Senior Management reviews this Policy annually and revises it as necessary to reflect changing operational conditions, new technology, government policies and legislation.

ANNUAL APPROVAL OF CORPORATE POLICIES

Approved by the CEO and Managing Director.

Annual Verification

Date: 17<sup>th</sup> June 2022

Verification Stamp:



Annual Verification

Date: 3<sup>rd</sup> April 2023

Verification Stamp:



Annual Verification

Date: 27<sup>th</sup> March 2024

Verification Stamp:



Annual Verification

Date:

Verification Stamp:

Annual Verification

Date:

Verification Stamp: