

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. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual 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 collects this information in a transparent way, and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply:

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 unauthorized or illegal access by internal or external parties.

Our data will:

- Be communicated formally.
- Be stored for the period necessary to perform the legitimate business of the Company.
- 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 owner of the data (exempting legitimate requests from legal enforcement authorities).

In addition to ways of handling the data, the Company has direct obligations towards 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:

- 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.).

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** persons who have an association with the Company.

Responsibility

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Continuous Improvement

This Policy is reviewed annually by Senior Management and revised as necessary to reflect changing operational conditions, new technology, government policies and legislation.

This Policy was approved by the CEO and Managing Director on 03.06.2019.

Signed Policies are available upon request.