

## **Data Protection Policy**

### **Introduction**

ITCC International Ltd needs to collect and use certain types of information about its clients, staff, and third parties with whom it deals in order to operate. This includes current, past, and prospective employees, clients, and others with whom we communicate. Additionally, we may occasionally be required by law to collect and use certain types of information to comply with the requirements of government departments for business data, for example. This personal information must be dealt with properly however it is collected, recorded, and used; whether on paper, in a computer, or recorded on other material; and there are safeguards to ensure this in the Data Protection legislation.

### **Importance of Data Protection**

We regard the lawful and correct treatment of personal information by ITCC International Ltd as very important to successful operations and to maintaining confidence between those with whom we deal and ourselves. We ensure that our organization treats personal information lawfully and correctly.

To this end, we fully endorse and adhere to the Principles of data protection, as enumerated in the Data Protection legislation. Specifically, the Principles require that personal information:

#### **1. Lawful and Fair Processing:**

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.

#### **2. Specified and Lawful Purposes:**

- Shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.

#### **3. Adequacy and Relevance:**

- Shall be adequate, relevant, and not excessive in relation to the purpose or purposes for which they are processed.

#### **4. Accuracy and Up-to-Date Information:**

- Shall be accurate and, where necessary, kept up to date.

#### **5. Retention Period:**

- Shall not be kept longer than is necessary for that purpose or those purposes.

#### 6. **Rights of Data Subjects:**

- Shall be processed in accordance with the rights of data subjects under the legislation.

#### 7. **Security Measures:**

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

#### 8. **International Transfers:**

- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **GDPR Compliance**

In addition to the above principles, we ensure compliance with the General Data Protection Regulation (GDPR), which includes:

- **Data Subject Rights:** Ensuring that data subjects have the right to access, rectify, erase, restrict processing, data portability, and object to processing.
- **Data Breach Notification:** Implementing procedures for handling data breaches, including notification requirements to the relevant supervisory authority and affected individuals.
- **Data Protection Officer (DPO):** If applicable, appointing a Data Protection Officer (DPO) and including their contact details in this policy.
- **Data Processing Agreements:** Engaging third-party processors with data processing agreements that outline the responsibilities and obligations of both parties.

### **Regular Reviews and Updates**

This policy will be reviewed and updated regularly to reflect changes in legislation, technology, and business practices. We are committed to maintaining the highest standards of data protection and ensuring that our practices are up to date and compliant with all relevant regulations.

### **Conclusion**

We are dedicated to protecting the privacy and rights of individuals whose data we process. By adhering to the principles outlined in this policy, we aim to maintain trust and confidence in our organization and ensure that we meet our legal obligations.

## Appendix: Data Subject Rights under GDPR

1. **Right to Access:** Data subjects have the right to obtain confirmation that their data is being processed and access to their personal data.
2. **Right to Rectification:** Data subjects have the right to have inaccurate or incomplete data corrected.
3. **Right to Erasure:** Data subjects have the right to have their data erased under certain conditions, also known as the "right to be forgotten."
4. **Right to Restrict Processing:** Data subjects have the right to restrict the processing of their data under certain conditions.
5. **Right to Data Portability:** Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.
6. **Right to Object:** Data subjects have the right to object to the processing of their data under certain conditions.

## Data Breach Procedures

In the event of a data breach, the following steps will be taken:

1. **Immediate Action:** The breach will be reported to the Data Protection Officer (DPO) or the designated responsible person.
2. **Assessment:** The breach will be assessed to determine the nature and extent of the breach and the potential impact on data subjects.
3. **Notification:** If required by law, the relevant supervisory authority will be notified within 72 hours of becoming aware of the breach.
4. **Communication:** Affected data subjects will be informed of the breach and the steps being taken to mitigate the impact.

## Data Protection Officer (DPO)

If applicable, the Data Protection Officer (DPO) for ITCC International Ltd is:

- **Name:** Nicola Scott
- **Contact Information:** [nicola@itccinternational.com](mailto:nicola@itccinternational.com)

## **Data Processing Agreements**

When engaging third-party processors, ITCC International Ltd will ensure that data processing agreements are in place. These agreements will outline the responsibilities and obligations of both parties regarding the processing of personal data.