

Title:

# Data Privacy Policy

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Role	Name	Title	Date	Signature
Author(s)	Alfred Schlaegel	CEO		
Reviewer(s)	John Doe	CEO		
Approver(s)	Jane Doe	QA		

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## 1 PURPOSE

The purpose of this policy is to establish guidelines for the protection and handling of customer data in compliance with global data privacy laws and regulations.

## 2 SCOPE

This policy applies to all employees, contractors, and third parties who have access to customer data processed by our solutions.

## 3 REFERENCES

### 3.1 Internal References

- Document: QA-IR01 Internal References

### 3.2 External References

The company has shaped its Data Privacy framework around the fundamental principles of the following internationally recognized standards or regulations:

- GDPR - General Data Protection Regulation
- NIST 800-53 Rev 5 - Security and Privacy Controls for Federal Information Systems and Organizations
- NIST SP 800-53 - Security and Privacy Controls for Federal Information Systems and Organizations

## 4 ABBREVIATIONS, TERMS & DEFINITIONS

Term	Definition
DPIA	Data Privacy Impact Assessment

## 5 ROLES AND RESPONSIBILITIES

Role	Responsibilities
Data Protection Officer	Responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements. Represented by Legal Department.
Manager	Responsible for implementing data privacy controls and procedures.
Employees	Responsible for adhering to the data privacy policy.

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## 6 PROCEDURE

We are committed to respecting and protecting the privacy of our customers. We ensure that all personal data collected through our solutions is processed in accordance with the applicable data protection laws and regulations.

### 6.1 Implementing Procedures

We have implemented procedures to ensure data privacy, including:

- Data minimization: We only collect and process the necessary data for the intended purpose.
- Consent: We obtain explicit consent from customers before collecting and processing their data.
- Data protection by design and by default: Our solutions are designed with data protection in mind, ensuring privacy settings are set at a high level by default.

### 6.2 Implementing Controls

We have implemented various controls to protect customer data, including:

- Access controls: Only authorized personnel have access to customer data.
- Encryption: Customer data is encrypted both at rest and in transit.
- Regular audits: We conduct regular audits to ensure compliance with this policy.

### 6.3 Implementing Reporting

We have established a robust reporting system to monitor and report on data privacy matters. This includes:

- Regular reporting: Our Data Protection Officer provides regular updates to senior management on data privacy matters.
- Incident reporting: In the event of a data breach, we have a clear process in place for reporting the incident to the relevant authorities and affected customers.
- Compliance reporting: We maintain comprehensive records of our data processing activities and make these available to regulatory authorities upon request.

### 6.4 Physical and Logical Security

We ensure the physical and logical security of our data through:

- Physical security: Our data centers are secured with multiple layers of physical security measures, including surveillance cameras, biometric access controls, and 24/7 security personnel.
- Logical security: We use firewalls, intrusion detection systems, and regular vulnerability assessments to protect our systems and data from cyber threats.

### 6.5 Training

We provide regular training to all employees and contractors on data privacy and security. This includes:

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- Understanding data privacy laws and regulations.
- Recognizing and responding to potential data breaches.
- Best practices for handling and protecting customer data.

## 7 ATTACHMENTS

ID	Name	Description
ATT01	Data Privacy Impact Assessment (DPIA)	Template for assessing the impact of data processing activities on data privacy, including fields for data types, processing purposes, risk assessment, and mitigation measures.
ATT02	Incident Reporting Form	Report template for documenting data breach incidents, including details of the breach, affected data, mitigation actions taken, and notifications to authorities and customers.
ATT03	Data Processing Agreement (DPA)	Template agreement to ensure third parties comply with data protection laws when processing customer data, including terms for data processing, security measures, and compliance requirements.

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## 8 DOCUMENT REVISION HISTORY

Author(s)	Date	Version	Description
Alfred Schlaegel	01-Jan-2025	1.0	Initial Version