



## **DATA PROTECTION POLICY**

**FOR**

### **CIRCLE OF EXCELLENCE LIMITED**

Company Registration Number: NZBN: 9429047124936

Postal Address: P.O. Box 333-56, Takapuna, Auckland, 0740

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## **COMPANY DATA PROTECTION POLICY**

### **POLICY BRIEF AND PURPOSE**

Circle of Excellence Limited Data Protection Policy refers to our commitment to treat 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.

### **SCOPE**

This Data Protection policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to Circle of Excellence Limited.

### **COVERED UNDER THE DATA PROTECTION POLICY**

Employees of Circle of Excellence Limited and its subsidiaries must follow this Data Protection policy. Contractors, consultants, partners and any other external entity are also covered.

Generally, this Data Protection policy refers to anyone we collaborate with or acts on behalf of Circle of Excellence Limited, and may need occasional access to data.

## **POLICY ELEMENTS**

As part of the operations of Circle of Excellence Limited, the Company needs to obtain and process information.

This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Circle of Excellence Limited collects this information in a transparent way and only with the full cooperation and knowledge of interested parties.

Once this information is available to the Company, the following rules apply.

### **The data will be:**

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

### **The data will not be:**

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organisations or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

**In addition to ways of handling the data, Circle of Excellence Limited has direct obligations towards people to whom the data belongs. Specifically the Company will:**

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

## **ACTIONS**

**To exercise data protection, Circle of Excellence Limited is committed to:**

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

Circle of Excellence Limited's data protection provisions will appear on our public forums.

## **DISCIPLINARY CONSEQUENCES**

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

**Updated: 1 June 2020**

**Signed by:**



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MICHAEL DAVID HANDCOCK  
Chairman | Chief Executive



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LANDI JAC  
Global Director