

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

REVIEW CYCLE	Annually
NEXT REVIEW DATE	24th October 2021
PERSON (S) RESPONSIBLE	Chief Executive Officer
APPROVING BODY	EYC Global

EYC Global's GDPR policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- ensuring that we comply with the eight data protection principles, as listed below
- meeting our legal obligations as laid down by the GDPR 2018
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet our operational needs or fulfil legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the organisation.

Data protection principles

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained 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. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the GDPR 2018.
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data 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.

IT Security Practices

Disposal of Data

Data maintained in EYC Global's systems remains in the cloud and is not replicated to physical media, data is continuously archived in the cloud. EYC Global maintains data in Microsoft Office Sharepoint

Point of Contact

Group Operations Director – Warren Averbuch (warren@eyc.global)

Security Breach Resolution

In the unlikely event of a security breach, EYC Global will be notified by the cloud provider and accounts will be locked by the cloud administration. To unlock accounts, an investigation must take place to ensure that further breaches will not happen.

Risk Management

Cloud providers include filters such as anti-phishing, and automatic account disconnect on in usability. IP addresses are used in order to authenticate the user to an actual PC.

For information regarding cloud security please see: <https://support.google.com/accounts/answer/46526?hl=en>
[https://developer.salesforce.com/page/An Overview of Force.com Security](https://developer.salesforce.com/page/An_Overview_of_Force.com_Security)

Backup Policy

EYC Global uses Office365 and Sharepoint Cloud Servers automated backup algorithm to ensure regular backups. EYC Global backs up its data weekly to archives on in a separate cloud account for redundancy.

Data Retention Period

EYC Global retains data for different periods based on the type of content:

- Financial data will be retained for a period of seven (7) years from its creation
- HR for a period of seven (7) years after a staff's termination of employment

There are special circumstances to specific documents which are outlined on our Integrated Management

System (IMS) Staff Training

All new staff are trained on EYC Global's cloud systems, training include:

- System access and log out
- System etiquette
- Security polices
- Trouble shooting
- Equipment handling
- Optimizing network usage