

ATLANDTIS & CO LTD

Data Policy

## Data Policy

### Data Protection and Rights of Data Subjects Policy

#### 1. Introduction

This outlines the technical facilities and measures that Atlandtis & Co Ltd implement to ensure compliance with the General Data Protection Regulation (GDPR) and to safeguard the rights of data subjects. The protection of personal data and privacy is of utmost importance to us, and we are committed to establishing and maintaining robust processes and systems to achieve this.

#### 2. Confidentiality, Integrity, Availability, and Resilience of Processing Systems and Services

2.1. Encryption and Access Controls: All personal data must be stored, transmitted, and processed using strong encryption methods. Access controls should be implemented to restrict data access based on roles and responsibilities.

2.2. Data Backups: Regular backups of all critical data must be performed to ensure data availability and resilience against data loss.

2.3. Disaster Recovery and Business Continuity: A comprehensive disaster recovery plan is in place to ensure timely recovery and continuity of operations in case of any data breach or system failure.

2.4. System Monitoring and Intrusion Detection: Continuous monitoring and intrusion detection mechanisms are established to identify and respond to any unauthorized access attempts.

2.5. Data Minimization: Only the necessary data required for processing should be collected and retained to minimize the risk of data exposure.

#### 3. Rights of Data Subjects

3.1. Privacy Information: Data subjects will be provided with clear and concise privacy information, including the purpose and legal basis for data processing, the rights they have, and contact information for the Data Protection Officer (DPO).

3.2. Access, Rectification, Deletion, and Portability: Procedures are in place to promptly respond to data subject requests to access, rectify, delete, or port their personal data. Requests are processed within the timelines specified by GDPR.

#### 4. Consent and Consent Recording

4.1. Active and Informed Consent: Consent must be obtained through an active opt-in process, ensuring data subjects are fully informed about the purposes and scope of data processing.

4.2. Consent Management: A consent management system should be implemented to record and track the details of each obtained consent, including the timestamp and version of consent given.

#### 5. Legal Safeguards for International Data Transfers

5.1. Standard Contractual Clauses (SCCs): In cases where personal data needs to be transferred outside the EU, SCCs must be incorporated into contracts to provide adequate legal safeguards for such transfers.

## 6. Records of Processing Activities

6.1. Data Mapping: We maintain comprehensive records of all personal data processing activities, including data flows, purposes of processing, data categories, recipients, and retention periods.

## 7. Regular Testing and Evaluation

7.1. Data Protection Impact Assessments (DPIAs): Conduct DPIAs for high-risk data processing activities to identify and mitigate potential risks to data subjects' rights and freedoms.

7.2. Security Audits: Atlandtis & Co Ltd regularly conduct security audits and assessments to evaluate the effectiveness of implemented technical facilities and measures.

7.3. Incident Response Testing: Our organisation regularly test incident response procedures to ensure a swift and effective response to data breaches.

## 8. Training and Awareness

8.1. Data Protection Training: Provide regular data protection training to employees and relevant third-party processors to ensure they understand their responsibilities and obligations under GDPR.

## 9. Compliance Monitoring

9.1. Internal Compliance Audits: We regularly perform internal audits to ensure adherence to this policy and GDPR requirements.

9.2. External Compliance Review: There is an engagement with external experts periodically to review and assess the company's compliance with GDPR and this policy.

## 10. Policy Review and Updates

10.1. We regularly review and update this policy to align with changes in GDPR regulations and best practices.

By adhering to our data policy, our company aims to create a robust data protection framework that safeguards the rights and privacy of data subjects and ensures compliance with the General Data Protection Regulation.