

GDPR POLICY STATEMENT – SEYYONE SOFTWARE SOLUTIONS

BACKGROUND:

This Policy is to ensure there is in place proper arrangements relating to personal data passed to Seyyone. This Policy is compliant with the requirements of the General Data Protection Regulation.

1. DEFINITIONS AND INTERPRETATION

"Data" means personal data passed;

"GDPR" means the General Data Protection Regulation;

2. DATA PROCESSING

Seyyone ensures processing the Data only in accordance with Data Protection Laws and in particular on the following conditions:

- a. Seyyone has implemented appropriate technical, physical and administrative safeguards to ensure a level of security appropriate to the risk, including but not limited to, biometric authenticated entry, disabled duplicating facilities, restricted access, password at all levels, 128-bit data encryption, etc.
- b. Seyyone shall only process the Data on the written instructions from Customer (ii) only process the Data for completing the Services;
- c. Seyyone ensures that all employees and other representatives accessing the Data are (i) aware of the this Policy and (ii) have received comprehensive training on Data Protection Laws and related good practice, and (iii) are bound by a commitment of confidentiality;
- d. Seyyone shall not involve any third party other than employees of Seyyone and its associate companies in the processing of the Data without the consent of Customer.
- e. Taking into account the nature of the processing, Seyyone shall assist Customer by appropriate technical and organisational measures, in so far as this is possible, for the fulfilment of Customer's obligations;
- f. Seyyone shall assist Customer in ensuring compliance with the obligations pursuant to security, notification of data breaches, communication of data breaches to individuals, data protection impact assessments and when necessary consultation with the ICO etc, taking into account the nature of processing and the information available to Seyyone;
- g. Seyyone shall, at Customer's choice safely delete or return the Data at any time. Deletion shall include destruction of all existing copies unless otherwise a legal requirement to retain the Data;
- h. Seyyone shall make immediately available to Customer all information necessary to demonstrate compliance with the obligations laid down under this Policy and allow for and contribute to any audits, inspections or other verification exercises required by Customer from time to time;
- i. Seyyone has made arrangements relating to the secure transfer of the Data from Customer and the safe keeping of the Data.
- j. Seyyone shall maintain the integrity of the Data, without alteration, ensuring that the Data can be separated from any other information created; and immediately contact Customer if there is any personal data breach or incident where the Data may have been compromised.