



SUPASIM

DATA PROTECTION POLICY

Last Updated

21/07/2023

Definitions:

Company:	Means SupaSim, a registered Company.
GDPR:	Means the General Data Protection Regulation.
Responsible Person:	Means Directors of SupaSim
Register of Systems:	Means a record of all systems where the Company processes personal data.

Data Protection Principles under GDPR:

1. Lawful, Fair, and Transparent Processing: Personal data must be processed lawfully, fairly, and transparently with respect to individuals.

2. Purpose Limitation: Data should be collected for specified, explicit, and legitimate purposes and not further processed in a way incompatible with those purposes. Exceptions apply for archiving, research, or statistical purposes.

3. Data Minimization: Data should be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

4. Accuracy and Timeliness: Every reasonable step must be taken to ensure the accuracy and timeliness of personal data. Inaccurate data should be erased or rectified promptly.

5. Storage Limitation: Personal data should be kept in a form that permits identification of data subjects only for the necessary duration. Longer retention may apply for archiving or research purposes with appropriate safeguards.

6. Security and Integrity: Personal data should be processed with appropriate security measures to protect against unauthorized or unlawful processing, accidental loss, destruction, or damage. Technical and organizational measures should be implemented as required by GDPR to safeguard individuals' rights and freedoms.

General Data Processing Provisions:

- a. This policy governs all personal data processed by the Company.
- b. The Responsible Person is accountable for ensuring the Company's compliance with this policy.
- c. The policy shall undergo annual review.
- d. The Company shall register as a data-processing organization with the Information Commissioner's Office.

Lawful, Fair, and Transparent Processing:

- a. The Company maintains a Register of Systems to ensure lawful, fair, and transparent data processing.
- b. The Register of Systems is subject to annual review.
- c. Individuals have the right to access their personal data, and the Company will handle such requests promptly.

Lawful Purposes:

- a. Data processing by the Company must be based on lawful grounds: consent, contract, legal obligation, vital interests, public task, or legitimate interests.
- b. The appropriate lawful basis will be noted in the Register of Systems.
- c. If consent is used as a lawful basis, evidence of opt-in consent will be retained with the personal data.
- d. Revocation of consent options will be provided, and systems will reflect consent revocations accurately.

Data Minimization:

- a. The Company ensures that personal data is adequate, relevant, and limited to the necessary scope for the intended purposes.

6. Accuracy:

- a. Reasonable steps will be taken to maintain the accuracy of personal data.
- b. Necessary measures will be implemented to keep personal data up-to-date based on the lawful basis for processing.

Archiving / Removal:

- a. An archiving policy will be established for each area of personal data processing to ensure data retention aligns with necessity.
- b. The archiving policy will determine which data should be retained, for how long, and the reasons.

Security:

- a. Personal data will be securely stored using up-to-date software.
- b. Access to personal data will be restricted to authorized personnel, with appropriate security measures in place.
- c. Deletion of personal data will be performed safely to prevent recovery.
- d. Backup and disaster recovery solutions will be implemented.

Breach:

In the event of a data breach, the Company will assess the risks to individuals' rights and freedoms and promptly report the breach to the EDPS, if necessary.