

Data Protection Policy

TUDOR Scan Tech AG

| | |
|--------------|------------|
| Last updated | 24.05.2018 |
|--------------|------------|

Definitions

| | |
|----------------------------|---|
| Company | means TUDOR Scan Tech AG, a registered Company. |
| GDPR | means the General Data Protection Regulation. |
| Register of Systems | means a register of systems in which personal data is processed by the Company. |

1. Data protection principles

The Company is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data is:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes will not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the Company.
- b. The Responsible Person takes responsibility for the Company’s ongoing compliance with this policy. The following email address is provided for inquiries: office@tudor-tech.ch
- c. This policy is reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Company maintains a Register of Systems.
- b. The Register of Systems is reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Company will be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Company are done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Company notes the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent is kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Company's systems.

5. Data minimisation

- a. The Company ensures that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Company takes reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps are put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Company puts in place an archiving policy for each area in which personal data is processed

8. Security

- a. The Company ensures that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data is limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. Appropriate back-up and disaster recovery solutions is in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Company will promptly assess the risk to people's rights and freedoms.