

Personal Data Protection Policy



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1 Personal Data Protection Policy

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1.1 General

Hyarchis respects personal privacy. The purpose of the personal data protection policy is to set guidelines and oblige Hyarchis managers to ensure proper compliance with and respect for the provisions of the General EU Data Protection Regulation (GDPR), the personal data protection legislation of the Kingdom of the Netherlands and the Republic of Lithuania, the Labor Code and other personal data protection legislation, respect for individual privacy.

1.2 Scope

This policy applies to all *Hyarchis* staff using *Hyarchis* resources.

1.3 Security policy and responsibilities in the company

Hyarchis strives to securely and properly process the personal data of employees and customers, to ensure their confidentiality in accordance with legal requirements, and therefore takes all necessary technical and organizational measures to protect the personal data of employees, partners and customers:

- Hyarchis collects and stores personal data only lawfully, only to the extent necessary and for no longer than is necessary, i. e. information which is not used for a specific pre-defined purpose may not be collected and stored and personal data shall be kept for no longer than is necessary for the purposes of the processing.
- Personal data shall be processed accurately and fairly, shall not be out of date and inaccurate, and shall be subject to confidentiality and the confidentiality of any information relating to personal data, unless such information is in the public domain in accordance with applicable laws or regulations.
- Hyarchis processes customers' personal data only for the purpose of better consulting, offering the best solutions and enforcing concluded contracts.
- Hyarchis has well-established internal procedures and rules that define the purposes, scope, and collection, storage, and storage of personal data of employees and customers. Employees must be informed of these procedures or rules and always have access to them.
- Hyarchis customers must be able to express their consent or disagreement with the use and storage of their personal data and to request the deletion or transfer of their personal data, unless this would interfere with the performance of their contractual obligations. Customers must also be able to express their consent or disagreement to the use of their personal data for marketing purposes by signature or electronic means.

- There are designated persons responsible for the proper application of the provisions of the GDPR and to inform employees to whom they can turn in matters relating to the GDPR. The company may use external consultants to design and implement procedures in accordance with the GDPR Regulation.
- Personal data processed by Hyarchis shall be provided to third parties (data recipients) only in the cases and according to the procedure established by laws and other legal acts, with the consent of the data subject or on other legal grounds for the provision of data.
- As most personal data is collected and stored electronically, managers must ensure that personal data collected and stored on corporate servers, computers or other media is protected from viruses and other attempts to intercept or leak personal data in an unauthorized manner.

1.4 Legal framework in the company

- Internal and external requirements are known and understood by all Hyarchis employees.
- Applicable laws and local regulations are known, understood and maintained.

1.5 Documentation

- Hyarchis periodically conducts internal and external inspections.
- The policy is available to stakeholders and published on the Hyarchis website.

1.6 Existing technical and organisational measures

Appropriate technical and organisational measures are implemented and substantiated considering the purpose of the processing, the state of the technology and the implementation costs.

The description of the implemented technical and organisational measures is based on the structure of ISO/IEC 27001 and ISO/IEC 27018:

- Access control
- Information classification (and handling thereof)
- Physical and environmental-related security for end users such as:
 - Permissible use of values
 - Guideline for information transfer based on the work environment and screen locks
 - Mobile devices and telecommuting
 - Restriction of software installation and use
- Data backup
- Information transfer
- Protection against malware
- Handling technical weak points
- Cryptographic measures
- Communication security
- Privacy and protection of personal information
- Supplier relationships - regular inspection and evaluation of data processing, especially the efficacy of the implemented technical and organisational measures

1.7 Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

1.8 Distribution

This policy is to be distributed to all *Hyarchis* staff.

