

# Data Protection Policy

## Policy Statement

Pupa Training and Consultancy Services Limited Liability Company (hereinafter referred to as the "Company") needs to collect personal data to effectively carry out business activities. Such data is collected from employees, customers, potential customers, visitors, clients and suppliers includes (but is not limited to) name, address, e-mail address, date of birth, identification numbers, private and confidential information, sensitive information and bank/credit card details. All data we collect, keep and process is done transparently, in compliance with the law and used only for the purposes of meeting our legal & contractual requirements.

## Purpose and Scope

Ensuring and maintaining the security and confidentiality of personal and/or special category data is one of our top priorities and the Company has developed procedures, controls and measures to ensure maximum and continued compliance with the data protection laws and principles. The aim of such controls and measures is to ultimately minimise the risk of breaches and uphold the protection of personal data.

We aim to ensure that this policy will be adhered to by all staff within the Company.

We are committed to ensuring that all personal data processed by the Company is done so in accordance with the data protection laws and its principles. We never provide the personal data to anyone else unless it is essential to meet our contractual or legal requirements.

## Principles

- All personal data we hold is collected, stored, used and processed fairly and lawfully.
- All personal data shall be obtained only for the specified, explicit and legitimate purposes and shall not be further processed in any manner incompatible with those purposes.
- All personal data we collect and use shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are used.
- We will endeavour to keep all personal data accurate and, where necessary, up to date.

- Personal data processed for any purposes shall not be kept for longer than is necessary for those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Law.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful access to the personal data. Appropriate technical and organisational measures will be taken to prevent accidental loss, destruction and damage to the personal data.
- Personal data shall not be transferred to any third party and shall only be used by the Company.

## **Confidentiality**

Where personal data is collected to assess prior knowledge and training needs, we will keep this information:

- only for the time needed to to make the assessment
- fully confidential and only provide this data to whom needs this information to make the assessment.

The information will not be used in a way that may cause detriment to the individuals concerned.

All sensitive personal/ organisational information that is supplied, or which we are given access to, will be kept confidential.

We will not use or disclose confidential, proprietary, trade secret or commercially sensitive information provided to us to any other person, firm, or corporation. Confidentiality agreements can be provided on request.