



# Data Protection Policy

## Overview

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## Policy brief & purpose

Our Company Data Protection Policy refers to our commitment to treat information of consumers, employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

## Scope

This policy refers to all parties (employees, job candidates, consumers, customers, suppliers data providers, etc.) who provide any amount of information to us.

## Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

## Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, demographic data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

*Our data will be:*

- Accurate and kept up-to-date.
- Collected fairly and for marketing and lawful purposes only.
- Processed by the company within its legal and moral boundaries.
- Protected against any unauthorized or illegal access by internal or external parties.

*Our data will not be:*

- Communicated informally.
- Stored for more than a specified amount of time.
- Transferred to organizations, states or countries that do not have adequate data protection policies.
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected.
- Inform people about how we'll process their data.
- Inform people about who has access to their information.
- Have provisions in cases of lost, corrupted or compromised data.
- Allow people to request that we modify, erase, reduce or correct data contained in our databases.

## Actions

To exercise data protection we're committed to:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyberattacks.
- Establish clear procedures for reporting privacy breaches or data misuse.
- Include contract clauses or communicate statements on how we handle data.
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

## Personal Data Protection Training

Every new employee must join the first day Personal Data Protection training.

For every employee processing personal data, it is mandatory to join the Personal Data Protection training on MSLA Training Platform including a successful exam before starting personal data processing. An annually refresh training is also mandatory.

## MSLA Data Protection Officer

The MSLA Data Protection Officer, being internally independent of professional orders, works towards the compliance with national and international data protection regulations. He is responsible for the Data Protection Policy and supervises its compliance. The MSLA Data Protection Officer is appointed by the MSLA Board.

The data protection representatives shall promptly inform the MSLA Data Protection Officer of any data protection risks.

Any data subject may approach the MSLA Data Protection Officer, or the relevant data protection representative, at any time to raise concerns, ask questions, request information, or make complaints relating to data protection or data security issues. If requested, concerns and complaints will be handled confidentially.

## Supplementary Documents

- MSLA International Privacy Policy
- Information Security Policy -MSLAI

## Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.