

Pgogy Webstuff Ltd.

Registered company number:10681846

Data Protection Policy

Version 1.0

Last updated 29 January 2024

Policy brief & purpose

Our **Data Protection Policy** refers to our commitment to treat information of 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, customers, suppliers etc.) who provide any amount of information to us.

Who is covered under the Data Protection Policy?

Employees of Pgogy Webstuff Ltd. 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, usernames and passwords, digital footprints, photographs, 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 lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorised 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 organisations, 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
- 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 (secure locks, frequent backups, access authorisation etc.)
- Maintain a registration with the Information Commissioner's Office

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.

Further reading:

- Data Protection Act of 1998 (UK)
- Data protection in United States