

Assure Data Protection Policy

Last Updated: 2/02/23

Definitions

GDPR	General Data Protection Regulation.
Responsible Person	Appointed KYC reviewer and/or Owner/Founder/CEO

1. Data protection principles

Assure is committed to processing data responsibly per the following GDPR guidelines:

Article 5 of the GDPR requires that personal data shall be:

- 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.
- 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.
- 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 Assure.
- b. The Responsible Person shall take responsibility for Assure's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful purposes

- a. All data processed by Assure must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).

- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

4. Data minimisation

- a. Assure shall make reasonable efforts to ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

5. Accuracy

- a. Assure shall make reasonable efforts to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, Assure shall make reasonable efforts to ensure that personal data is kept up to date.

6. Archiving / removal

- a. Assure shall make reasonable efforts to ensure that personal data is kept for no longer than necessary and put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

7. Security

- a. Assure shall make reasonable efforts to ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted Assure will make reasonable efforts for this to be done safely such that the data is irrecoverable.
- d. Appropriate back-up solutions shall be in place.

8. 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, Assure shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

END OF POLICY