COSTAS
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ORGANIZATION

Costas Papaellinas Organization

Data Privacy Policy

Contents

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EY	Margarita Anastasiou	Panikos Vassiliou
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1. Introduction

Costas Papaellinas Organization (here after "CPO Group", "we", "our", "us", "the Company") endeavours to meet leading standards for data protection and privacy. This Privacy policy applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.

While our reasons are founded in ethical and corporate responsibility, our privacy practices as outlined in this policy facilitate the establishment of the following:

- Competitive Advantage: Our emphasis on protecting the privacy of customers, vendors, and employees distinguishes us from our competitors.
- Good Corporate Citizenship: A sound privacy policy is emblematic of reliable corporate citizens that respect data subjects' privacy.
- Business Enablement: Since CPO Group uses significant volumes of personal information, privacy notices become a prerequisite to building enduring business relationships.
- Legal Protection: Appropriate privacy notices offer an opportunity to eliminate allegations of unlawful usage of personal information.
- Comply with the General Data Protection Regulation (GDPR): failure to comply with the provisions of the GDPR may expose CPO Group to potential fines of up to EUR20 million or 4% of total worldwide annual turnover, whichever is higher.

This document (together with Related Policies and Privacy Guidelines) is an internal document and cannot be shared with third parties, clients or regulators without prior authorisation from the DPO.

2. Purpose

This Policy defines requirements to help ensure compliance with laws and regulations applicable to CPO Group collection, storage, use, transmission, disclosure to third parties and retention of Personal and special categories of personal data (also referred to as personal and sensitive personal information respectively in this policy).

3. Scope

This policy is applicable to all CPO Group employees, contractors, vendors, interns, customers, and business partners who may receive personal information from CPO Group, have access to personal information collected or processed by or on behalf of CPO Group, or who provide information to CPO Group.

This policy covers the treatment of personal information gathered and used by CPO Group for lawful business purposes. This policy also covers the personal information we share with authorized Third Parties or that Third Parties share with us.

4. Objective

The main objectives of the Data Privacy Policy are:

- To ensure that all of the personal information in CPO Group custody is adequately protected against threats to maintain its security.
- To ensure that CPO Group employees are fully aware of the contractual, statutory or regulatory implications of any privacy breaches.
- To limit the use of personal information to identified business purposes for which it is collected.
- To create an awareness of privacy requirements to be an integral part of the day to day operation of every employee and ensure that all employees understand the importance of privacy practices and their responsibilities for maintaining privacy.
- To make all the employees aware about, the processes that need to be followed for collection, lawful usage, disclosure/ transfer, retention, archival and disposal of personal information.
- To ensure that all third parties collecting, storing and processing personal information on behalf of CPO Group provide adequate data protection.
- To ensure that applicable regulations and contracts regarding the maintenance of privacy, protection and cross border transfer of personal information are adhered to.

5. Accountability and Management

5.1. A Data Privacy Policy shall be developed and maintained to document the privacy principles and practices followed by CPO Group. (Refer: Appendix A – Privacy principles)
5.2. A privacy organization shall be defined for governance of data privacy initiatives. (Refer: Appendix B – Privacy organization structure)
5.3. A Data Privacy Officer (DPO) shall be appointed (or DPO function) to process complaints and requests for information related to CPO Group privacy practices.
5.4. Implementing Privacy by Design when Processing Personal Data and completing DPIAs where Processing presents a high risk to rights and freedoms of Data Subjects;
5.5. Establish procedures for the identification and classification of personal information.
5.6. CPO Group Privacy Policy statement shall be made available on CPO Group internal portal.
5.7. The Data Privacy Policy shall be communicated to CPO Group internal personnel.
5.8. Procedures shall be established for disciplinary and remedial action for violations of the Data Privacy Policy.
5.9. Changes or updates to the Data Privacy Policy shall be communicated to CPO Group internal personnel when the changes become effective.
5.10. Establish procedures for performing mandatory registration with regulatory bodies.
5.11. Risk Assessment is to be carried out on a periodic basis to ensure risks to personal information are identified and mitigated.
5.12. The potential impact on data privacy is assessed when new processes involving personal information are implemented, or when significant changes are made to such processes. (Refer: Appendix C – Privacy Impact Assessment guidelines)

6. Privacy Notice and Transparency

6.1. Appropriate notice shall be provided to data subjects at the time personal information is collected.
6.2. When CPO Group is the Data Controller for PII data it must provide detailed, specific information to Data Subjects depending on whether the information was collected directly from Data Subjects or from elsewhere. Such information must be provided through appropriate Privacy Notices or Fair Processing Notices which must be concise, transparent,

intelligible, easily accessible, and in clear and plain language so that a Data Subject can easily understand them.

6.3. The privacy notice or policies and other statements to which they are linked shall provide as full information as is reasonable in the circumstances to inform an individual how their personal information will be used so that CPO Group use is fair and lawful. The following information should be considered for inclusion in a notice (as is appropriate in individual circumstances):

6.3.1. Purposes for which personal information is collected, used and disclosed;

6.3.2. Choices available to the individual regarding collection, use and disclosure of personal information, wherever applicable;

6.3.3. Period for which personal information shall be retained as per identified business purpose or as mandated by regulations, whichever is later;

6.3.4. That personal information shall only be collected for the identified purposes;

6.3.5. Methods employed for collection of personal information, including 'cookies' and other tracking techniques, and third party agencies;

6.3.6. That an individual's personal information shall be disclosed to Third Parties only for identified lawful business purposes and with the consent of the individual, wherever possible;

6.3.7. That an individual's personal information may be transferred within CPO Group entities, globally as per requirement, for business purposes with adequate security measures required by law or as per guidance of provided by industry leading practices;

6.3.8. Consequences of withholding or withdrawing consent to the collection, use and disclosure of personal information for identified purposes;

6.3.9. Data subjects are responsible for providing CPO Group with accurate and complete personal information, and for contacting the entity if correction of such information is required;

6.3.10. Process for an individual to view and update their personal information records;

6.3.11. Process for an individual to register a complaint or grievance with regard to privacy practices at CPO Group;

6.3.12. Contact information of person in charge of privacy practises and responsible for privacy concerns with address at CPO Group;

6.3.13. Process for an individual to withdraw consent for the collection, use and disclosure of their personal information for identified purposes; and

6.3.14. That explicit consent is required to collect, use and disclose personal information, unless a law or regulation specifically requires or allows otherwise.

6.4. Data subjects shall be provided a Privacy Notice in case any new purpose is identified for using or disclosing personal information before such information is used for purposes not previously identified.

6.5. When Personal Data is collected indirectly (for example, from a third party or publically available source), you must provide the Data Subject with all the information required by the GDPR as soon as possible after collecting/receiving the data. You must also check that the Personal Data was collected by the third party in accordance with the GDPR and on a basis which contemplates our proposed Processing of that Personal Data.

7. Choice and Consent

7.1. A Data Controller must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent.

7.2. A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient.
7.3. If Consent is given in a document which deals with other matters, then the Consent must be explicit from those other matters.
7.4. A Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured.
7.5. Consent may need to be refreshed if there is intention to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented.
7.6. Explicit consent shall be obtained from data subjects at the time of collection of personal information or as soon as practical thereafter.
7.7. Explicit consent shall be obtained from data subjects for the collection, use and disclosure of their personal information, unless a law or regulation specifically requires or allows otherwise. A record is maintained of explicit consent obtained from data subjects.
7.8. Consent shall be obtained from data subjects before their personal information is used for purposes not previously identified.
7.9. Unless we can rely on another legal basis of Processing, Explicit Consent is usually required for Processing Sensitive Personal Data, for Automated Decision-Making and for cross border data transfers. Usually we will be relying on another legal basis (and not require Explicit Consent) to Process most types of Sensitive Data. Where Explicit Consent is required, you must issue a Fair Processing Notice to the Data Subject to capture Explicit Consent.
7.10. CPO Group must maintain evidence on types of Consent and keep records of all Consents captured so that the Company can demonstrate compliance with Consent requirements.
7.11. Requests for consent should be designed to be appropriate to the age and capacity of the subject and to the particular circumstances (e.g. children who are not older than 16th, vulnerable data subjects).
7.12. Organisation should establish communication guidelines to notify other data controllers (with whom PI was shared) for rectification/deletion/restricting of personal data of data subject.
7.13. Organisation should document guidelines for managing directories of subscribers to electronic services which include the following:
- Guidelines for obtaining consent from the end users.
- What information is to be provided to the data subject at the time of data collection (purpose, search functions, right to object and information how personal data can be rectified or deleted).

8. Collection of Personal Information

8.1. The collection of personal information shall be limited to the minimum requirement for lawful business purposes.
8.2. The GDPR allows Processing for specific purposes, some of which are set out below:
a. The Data Subject has given his or her Consent;
b. The Processing is necessary for the performance of a contract with the Data Subject;
c. To meet our legal compliance obligations;
d. To protect the Data Subject's vital interests;
e. To pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for which we process Personal Data for legitimate interests need

to be set out in applicable Privacy Notices or Fair Processing Notices; or

f. [OTHER GDPR PROCESSING GROUNDS]: identify and document the legal ground being relied on for each Processing activity [in accordance with the Company's guidelines on Lawful Basis for Processing Personal Data].

8.3. Methods of collecting personal information shall be reviewed by management to ensure that personal information is obtained:

8.3.1. Fairly, without intimidation or deception, and

8.3.2. Lawfully, adhering to laws and regulations relating to the collection of personal information.

8.4. Management shall confirm that Third Parties from whom personal information is collected:

8.4.1. Use fair and lawful information collection methods, and

8.4.2. Comply with the CPO Group Data Privacy Policy and their contractual obligations with respect to the collection, use and transfer of personal information on behalf of CPO Group

8.5. Data subjects shall be notified if additional information is developed or acquired about them.

9. Data Minimization

9.1. Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

10. Limiting Use, Disclosure and Retention

10.1. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

10.2. Personal information retention shall be only for the duration necessary to fulfil the identified lawful business purposes or as prescribed by law.

10.3. Guidelines and procedures shall be developed for the retention and disposal of personal information. These shall address minimum and maximum retention periods, and modes of storage.

10.4. Upon the expiration of identified lawful business purposes or withdrawal of consent, CPO Group shall either securely erase or anonymize the data subjects' personal information. Data is anonymized to prevent unique identification of an individual.

11. Data Subject Rights and Requests

11.1. Processes shall be established for data subjects to:

11.1.1. Request access to their personal data or information;

11.1.2. Correct or update their personal data or information;

11.1.3. Withdraw consent for the collection, use and disclosure of their personal information.

11.1.4. Request to receive certain information about the Data Controller's Processing activities;

11.2. The identity of data subjects requesting access their personal information, or the identity of the data subjects authorized by the data subject to access the data subject's information, shall be reasonably verified before providing access to such information.

11.3. A response shall be given data subjects requesting access to their personal information in an accessible form, within a defined period (i.e. 1 month) from receipt of complaint or request as prescribed by law.

11.4. Data subjects shall be notified, in writing, the reason for any denial of requests for access to personal information to the extent required by applicable law.

12. Transfer Limitation

12.1. CPO Group shall limit data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined

12.2. CPO Group may only transfer Personal Data outside the EEA if one of the following conditions applies:

(a) The European Commission has issued a decision confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subjects' rights and freedoms;

(b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the DPO;

(c) The Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or

(d) the transfer is necessary for one of the other reasons set out in the GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.

13. Disclosure to Third Parties

13.1. Where reasonably possible, management shall ensure that third parties collecting, storing or processing personal information on behalf of CPO Group have:

13.1.1. Signed agreements to protect personal information consistent with CPO Group Data Privacy Policy and information security practices or implemented measures as prescribed by GDPR;

13.1.2. Signed non-disclosure agreements or confidentiality agreements which includes privacy clauses in the contract; and

13.1.3. Established procedures to meet the terms of their agreement with CPO Group to protect personal information.

13.2. Personal information may be transferred outside European Union (EU) jurisdiction from where CPO Group operates for storage or processing where any of the following apply:

13.2.1. The individual has given consent to the transfer of information

13.2.2. The transfer is necessary for the performance of a contract between the individual and CPO Group, or the implementation of pre-contractual measures taken in response to the individual's request.

13.2.3. The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between CPO Group and a third party.

13.2.4. The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

13.2.5. The transfer is required by law

13.2.6. The transfer is necessary in order to protect the vital interests of the individual.

13.2.7. The transfer is made under a data transfer agreement.

13.2.8. The transfer is otherwise legitimised by applicable law.

13.3. Remedial action shall be taken in response to misuse or unauthorized disclosure of personal information by a third party collecting, storing or processing personal information on behalf of CPO Group

14. Security Practices for Privacy

14.1. CPO Group information security policy and procedures shall be documented and implemented to ensure reasonable security for personal information collected, stored, used, transferred and disposed by CPO Group.

14.2. CPO Group shall comply with all applicable aspects of CPO Group Information Security Program or comply with the administrative, physical and technical safeguards implemented and maintained in accordance with the GDPR and relevant standards to protect Personal Data.

14.3. Information asset labelling and handling guidelines shall include controls specific to the storage, retention and transfer of personal information.

14.4. Management shall establish procedures that maintain the logical and physical security of personal information.

14.5. Management shall establish procedures that ensure protection of personal information against accidental disclosure due to natural disasters and environmental hazards.

14.6. Incident response protocols are established and maintained in order to deal with incidents concerning personal data or privacy practices. (Refer: Appendix D – Data breach response guidelines)

14.7. CPO Group must maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:

(a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it.
(b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed.
(c) Availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.

15. Quality of Personal Information

15.1. CPO Group may perform additional validation procedures to ensure that personal information collected is accurate and complete for the business purposes for which it is to be used.

15.2. CPO Group shall ensure that personal information collected is relevant to the business purposes for which it is to be used.

16. Privacy Monitoring and Enforcement

16.1. Procedures shall be established for recording and responding to complaints/ grievances registered by data subjects.

16.2. Each complaint regarding privacy practices registered by data subjects shall be validated, responses documented and communicated to the individual.

16.3. Annual privacy compliance review shall be performed for identified business processes and their supporting applications.

16.4. A record shall be maintained of non-compliances identified in the annual privacy reviews. Corrective and disciplinary measures shall be initiated and tracked to closure, guided by CPO Group management.
16.5. Procedures shall be established to monitor the effectiveness of controls for personal information and for ensuring corrective actions, as required.
16.6. Any conflicts or disagreements relating to the requirements under this policy or associated privacy practices shall be referred to the Data Privacy Officer for resolution.

17. Personally Identifiable Information (PII) of CPO Group employee

Data protection laws govern the use of personally identifiable information. This term means any data relating to a living individual who can be identified using that data. CPO Group may hold the following types of sensitive and non-sensitive PII:

- names, addresses, telephone numbers and other personal contact details;
- gender, date of birth, physical or mental health or condition;
- marital status, next of kin, racial or ethnic origin, sexual orientation, religious, philosophical, political or similar beliefs;
- national insurance or social insurance number, immigration status, trade union membership;
- personnel records including training, appraisal, performance and disciplinary information, and succession planning;
- bank details, salary, bonus, benefits and pension details and other financial information; and
- criminal offences committed (or allegedly committed) including any proceedings and sentencing in relation to any such criminal offence.

18. Staff data processing activities

Personal information about individuals may only be processed for a legitimate purpose. CPO Group may undertake a number of activities with an individual employee's personal information including, but not limited to:

- salary, benefits and pensions administration;
- health and safety records and management;
- security vetting, criminal records checks and credit checks and clearances (where applicable and allowed by law);
- confirming information on résumés, CVs and covering letters, providing reference letters and performing reference checks;
- training and appraisal, including performance evaluation and disciplinary records;
- staff management and promotions;
- succession planning;
- equal opportunities monitoring;
- any potential change of control of a group company, or any potential transfer of employment relating to a business transfer or change of service provider;
- other disclosures required in the context of staff employment;
- promoting or marketing of CPO Group, its products or services;
- provision of staff or business contact information to customers and agencies in the course of the provision of CPO Group's services;

- CCTV monitoring for security reasons;
- compliance with applicable procedures, laws, regulations, including any related investigations to ensure compliance or of any potential breaches;
- establishing, exercising or defending CPO Group's legal rights;
- disclosures to other companies in the CPO Group group of companies, including companies in other countries to the extent permitted by law, including for the following purposes: as required in connection with the duties of the employee; legal compliance; audit; group level management; in connection with the fulfilment of customer and partner contracts;
- any other reasonable purposes in connection with an individual's employment or engagement by CPO Group;
- providing and managing use of services provided by third parties, such as company provided mobile phones, company credit cards and company cars and billing for such services.

18.1. CPO Group may also collect and process personal information about your next of kin so they can be contacted in an emergency or in connection with use of a company car provided by CPO Group. Their personal information will also be processed in accordance with the data protection laws and as described in the policy.

18.2. In order to fulfil the purposes set out above, CPO Group may disclose personal information to contractors and suppliers that provide services to CPO Group and who may assist in the processing activities set out above and also to law enforcement agencies, regulatory bodies, government agencies and other third parties as required by law or for administration/taxation purposes, to the extent local law allows and requires.

18.3. CPO Group may disclose your personal information to third parties for the purposes of establishing and managing your employment relationship. For example, CPO Group may disclose some of your personal information to:

- benefits providers (for example, pension and insurance providers);
- payroll and data processing suppliers and other service providers who assist us in establishing or managing your employment relationship with us;
- insurance claims and medical related service providers; and
- parties requesting an employment reference.

18.4. CPO Group shall take appropriate measures to ensure that its contractors and suppliers also process personal information in a compliant way and such measures may include a data processing agreement.

18.5. CPO Group may transfer personal information to other group companies, partners, suppliers, law enforcement agencies and to other organisations in all cases that are located outside of the country where you are based for the purposes of:

- HR administration (for example, staff recruitment);
- payroll processing for employees working outside the country where they are based;
- employee relocation;
- security clearances;
- visa applications;
- taxation and registrations for employees working outside the country where they are based;
- fulfilling CPO Group's legal requirements;
- fulfilling customer contracts for the provision of CPO Group's services;
- overseas legal proceedings;
- outsourcing CPO Group functions.

18.6. The laws of some jurisdictions may not be as protective as the laws in the country in which you are based. CPO Group may transfer your personal information across provincial or national borders to fulfil any of the above purposes, including to service providers located

in countries who may be subject to applicable disclosure laws in those jurisdictions, which may result in that information becoming accessible to law enforcement and national security authorities of those jurisdictions.

19. Record Keeping
    19.1. CPO Group shall keep full and accurate records of all data Processing activities.
    19.2. CPO Group must keep and maintain accurate corporate records reflecting Processing including records of Data Subjects' Consents and procedures for obtaining Consents.
    19.3. These records should include, at a minimum, the name and contact details of the Data Controller and the DPO, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place.

20. Retention of records

    20.1. CPO Group has a statutory duty to keep certain records for a minimum period of time. In other cases CPO Group shall not keep personal information for longer than is necessary or as may be required by applicable law.

21. Monitoring

    21.1. Monitoring of CPO Group's systems
    21.2. CPO Group's IT and communications systems are intended to promote effective communication and working practices within our organisation.
    21.3. For business reasons, and in order to carry out legal obligations in our role as an employer, use of CPO Group's systems on whatever platform including the telephone (mobile and fixed) and computer systems (including email and internet access), and any personal use of them, is monitored. If you access services by the use of passwords and login names on CPO Group's IT and communication systems this might mean that your personal access details are seen by CPO Group.
    21.4. Monitoring is only carried out if and to the extent permitted or as required by law and as necessary and justifiable for business purposes. The resulting log files may be used so that instances of attempted misuse and other security events can be detected and that information is available to support any subsequent investigation. To the extent permitted by law and, where breaches of this and other CPO Group policies or applicable law are found, action may be taken under the disciplinary procedure.
    21.5. The employees are informed that the telephone system used by the Company allows identification of all dialled numbers and received calls.
    21.6. CPO Group reserves the right to retrieve the contents of messages, check searches which have been made on the internet, require the immediate return of devices supplied by CPO Group and access data stored on such devices for the following purposes (this list is not exhaustive):
        - to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy (and employees acknowledge that the Company can use software to monitor the identity of senders and receivers of emails);
        - to find lost messages or to retrieve messages lost due to computer failure;

- to assist in the investigation of wrongful acts; or
- to comply with any legal obligation.

21.7. If evidence of misuse of CPO Group's IT systems is found, CPO Group may undertake a more detailed investigation in accordance with CPO Group's disciplinary procedures, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the disciplinary procedure. If necessary such information may be handed to the police in connection with a criminal investigation. Investigations and disclosure of information to the relevant authorities shall be carried out only to the extent permitted by law.

22. CCTV

22.1. Some of CPO Group's buildings and sites use CCTV systems to monitor their exterior and interior 24 hours a day for security reasons. This data is recorded. Use of CCTV and recording of CCTV data is only carried in accordance with CPO Group approved guidelines.

22.2. CPO Group shall take reasonable efforts to alert the individual that the area is under electronic surveillance.

23. Reporting Data Privacy Breach:

23.1. The GDPR requires Data Controllers to notify any Personal Data Breach to the Cyprus Data Protection regulatory authority and, in certain instances, the Data Subject.

23.2. CPO Group shall put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where is legally required to do so.

23.3. Where there is a suspicion of a Personal Data Breach occurrence, the DPO, the information technology or security department should be notified immediately and should follow the CPO Group SECURITY INCIDENT RESPONSE PLAN. All evidence relating to the potential Personal Data Breach should be preserved.

24. Exceptions and exclusions:

24.1. Controls related to monitoring of CPO Group's IT system and Infrastructure will not be applicable to CPO Group's operations in <this scenario or in this location>.

25. Glossary

Term	Definition
Anonymize	To process a collection of personal data or information such that a natural person cannot be identified on the basis of the output collection of data or information
Data subject	A living individual about whom personal information is processed by or on behalf of CPO Group
"CPO Group", "we", "our", "us", "the Company"	CPO Group / its Subsidiaries / its Group Companies / its affiliates, its directors, employees (excluding the User/affirming employee in this context), assigns and successors.
Information security	Preservation of confidentiality, integrity and availability of information; in addition, other properties, such as authenticity, accountability, non-repudiation, and reliability can also be involved.

Personal Data or personal information	Any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person
Sensitive personal data or sensitive personal information	Definition of sensitive personal information as per various laws that maybe relevant are stated below: The Data Protection Act, United Kingdom Sensitive personal data means personal data consisting of information as to: 1) the racial or ethnic origin of the data subject, 2) his political opinions, 3) his religious beliefs or other beliefs of a similar nature, 4) whether he is a member of a trade union, 5) his physical or mental health or condition, 6) his sexual life, 7) the commission or alleged commission by him of any offence, or 8) any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings. The Federal Data Protection Act, Germany 'Special categories of personal data' (Sensitive personal data) shall mean information on racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life. The Federal Data Protection Act, Switzerland Sensitive personal data: data on: 1) religious, ideological, political or trade union-related views or activities, 2) health, the intimate sphere or the racial origin, 3) social security measures, 4) administrative or criminal proceedings and sanctions; - Data file: any set of personal data that is structured in such a way that the data is accessible by data subject; - Personality profile: a collection of data that permits an assessment of essential characteristics of the personality of a natural person;
Third party	All external parties – including without limitation contractors, interns, summer trainees, vendors, service providers and partners – who have access to CPO Group information assets, information systems or who are pass personal information from them.

26. Appendix A: Privacy Principles

CPO Group Data Privacy Policy aligns with Generally Accepted Privacy Principles. In view of the changing legislative and technological environment for data privacy, the Data Privacy Policy will undergo revisions. The guiding privacy principles articulated in this policy document are as follows:

- Management:
  Define, document, communicate, and assign accountability for CPO Group Data Privacy policy and procedures

- Notice:
  Provide notice about CPO Group Data Privacy policy and procedures and identify the purposes for which personal information is collected, used, retained, and disclosed

- Choice and Consent:
  Describe the choices available to the individual and obtain implicit or explicit consent with respect to the collection, use, and disclosure of personal information

- Collection of personal information:
  Collect personal information only for the purposes identified in the notice

- Limiting Use, Disclosure and Retention:
  Limit the use, storage and retention of personal information is limited to the purposes identified in the data privacy notice and for which the individual has provided implicit or explicit consent. Retain personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information.

- Access for review and update:
  Provide data subjects with access to their personal information for review and update

- Disclosure to third parties:
  Disclose personal information to third parties only for the purposes identified in the notice and with the implicit or explicit consent of the individual

- Security practices for privacy:
  Protect personal information against unauthorized access (both physical and logical)

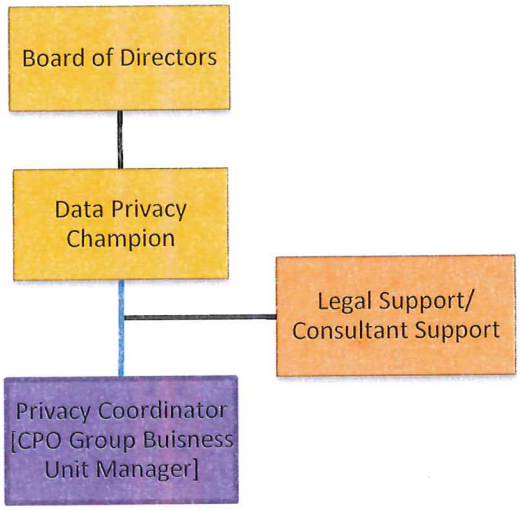
- Quality of personal information:
  Maintain accurate, complete, and relevant personal information for the purposes identified in the notice

- Monitoring and enforcement:
  Monitor compliance with CPO Group Data Privacy policy and procedures, and have procedures to address privacy related complaints and disputes

27. Appendix B: Privacy Organization structure

The privacy organization has been designed keeping in mind the various business units across locations where CPO Group operates. Stakeholders and oversight from key business functions and senior leadership provides sustainable and practical guidance for the privacy framework.

27.1. Privacy organization structure



27.2. Board of Directors (Senior Management)

The role of the Board of Directors is to channel resources and address organizational issues related to privacy.

Responsibilities of Board of Directors:

- Review and approve the Data Privacy Policy at least on a three year cycle.
- Establish a process for the enforcement of Data Privacy Policy.
- Ensure the implementation of a data privacy program that enables compliance with the Data Privacy Policy and applicable regulations with respect to data protection.
- Define processes to address grievances and handling complaints from data subjects with respect to their personal information held by CPO GROUP.
- Determine the action to be taken against grievances and information request cases presented by the Data Privacy Champion.
- Review the findings from periodic privacy compliance reviews and authorize the implementation of corrective actions if applicable.
- Monitor the data privacy program effectiveness.
  Identify and appoint a Data Privacy Champion.

27.3. Data Privacy Champion

The role of Data Privacy Champion (DPC) is to act as a central resource for the implementation of CPO GROUP privacy program. The DPC is required to advocate for the privacy program, articulate and communicate the organization's privacy goals, and promote enforcement of the Data Privacy Policy. The DPC will act as a single point of contact for internal personnel as well as

external data subjects seeking redress with regard to their personal information held by CPO GROUP or information about CPO GROUP privacy practices.

Responsibilities of Data Privacy Champion:

- Conduct review of the Data Privacy Policy over a three year cycle and recommend changes or policy updates to the Board.
- Monitor compliance with the Data Privacy Policy.
- Provide counsel relating to privacy aspects of business contracts and partnerships.
- Participate in data privacy audits.
- Coordinate with the offices of governmental agencies and supervisory authorities during the investigation of a privacy complaint against the organization.
- Handle requests for information made by individuals (rights management procedure) and third party agencies (including law enforcement agencies).
- Ensure that the Data Privacy Policy is aligned with applicable laws or regulations, and updated when there are changes to legislation.
- Facilitate privacy awareness training for all employees of CPO GROUP. The privacy awareness training should be designed with the following considerations:
    - Providing briefings, information and resources for employees to keep them apprised of current and emerging privacy requirements;
    - Providing employees with adequate guidance on identifying and appropriately handling data protection issues that may affect the performance of their job; and
    - Sensitizing employees to the importance of data privacy to data subjects and the organization.
- Maintain an organization-wide view of business processes impacting privacy, and the nature, size and sensitivity of personal information held by CPO GROUP.
- Respond to data breach notifications as per the defined data breach response procedure.
- Implement processes to address grievances and handling complaints from data subjects with respect to their personal information held by CPO GROUP.
- Respond to requests for access to and correction of personal information and general issues concerning personal information held by CPO GROUP.
- Maintain a record of all grievances and inquires registered by data subjects.
- Collate all grievances and information requests along with relevant and share relevant details to the Board for exceptions to established response processes.
- Facilitate the periodic (three year cycle) independent privacy compliance reviews, either through the Internal Audit function or an independent Third Party auditor. Through the compliance review process the following are to be considered:
    - Present the findings from the periodic privacy compliance reviews and privacy impact assessment to the Board.
    - Perform annual personal information inventory review and ensure reconciliation with the information asset inventory.
    - Formulate mitigation strategies for identified risks to privacy arising from CPO GROUP business operations, data collection practices, supporting technology, facilities and services exchanged with external parties.
    - Provide counsel relating to privacy aspects of business contracts and partnerships.
    - Ensure that the Data Privacy Policy is aligned with applicable laws or regulations, and updated when there are changes to legislation.
- Act as a liaison person for data privacy legal issues between the business functions and external Legal support if required.
- Ensure that training and updates are provided to Privacy Coordinators. The Privacy Coordinators should receive adequate training, both as they assume their role in the data privacy program, and as the program evolves to address new developments in the business

operations, data collection practices, supporting technology and services exchanged with external parties.
- Support the Privacy Coordinator and employees on Data Privacy Policy and organizational issues.

27.4. Privacy Coordinator (CPO Group Business Unit Manager)

The Privacy Coordinators will act as advocates for the data privacy program in their respective departments and locations. Situating the responsibility for the data privacy program locally and across the organization enables optimal resource placement and organizational awareness.

Responsibilities of Privacy Coordinators
- Support the Data Privacy Champion in the implementation and enforcement of controls arising out of the Data Privacy Policy.
- Maintain an organization-wide view of business processes impacting privacy, and the nature, size and sensitivity of personal information held by CPO and the business unit under their direct responsibility.
- Maintain and update annually the personal information inventory (Records of Processing Registry) for their respective locations.
- Coordinate efforts for periodic privacy compliance reviews.
- Assist the Data Privacy Champion in conducting privacy impact assessments at the initiation of any new/ modified business process, facility, service or technology that may impact the CPO Group privacy posture.
- Ensure that privacy risk mitigation strategies and controls to safeguard data are implemented, under the guidance of the Data Privacy Champion.
- Respond to data breach notifications as per the defined data breach response procedure.
    - Any suspected breach incident, GDPR or data privacy violation must be reported to the Data Privacy Champion for initiation of the breach response procedure.
    - Conduct the required investigation and collect incident information under the guidance of the Data Privacy Champion.
    - Assist the Data Privacy Champion in the completion of the appropriate documentation as part of the data breach procedure.
    - Follow any other breach management instructions received by the Data Privacy Champion.
- Respond to (or upon instruction from the Data privacy champion) data subject rights management requests in line with the CPO group procedure for managing rights.
    - Any data subject request relating to data privacy received by CPO group business unit manager must be raised to the group Data Privacy champion.
    - All such request must be handled following the group Data Subject Rights Management procedure.
    - Assist the Champion in in collecting the required information pertaining to the data subject request.
    - Identifying the data and all repositories where data exist relating to the data subject request.
    - Ensuring appropriate

27.5. Legal Support / Consultant Support

The role of the Legal Support and/or Consultant Support is to support the Data Privacy Champion and Board of Directors in their data privacy responsibilities as subject matter experts in legal, compliance, governance and Information Technology.

Responsibilities of Legal / Consultant Support:

- Provide assistance to the Data Privacy Champion o fulfilling the required responsibilities.
- Provide legal assistance to the Data Privacy Champion for identifying applicable regulations relations related to data privacy.
- Provide legal advice on the provisions of the GDPR and the processes/procedures of the organisation and how the provisions will affect the current processes/procedures.
- Advising as to the provisions regulating lawful processing at all times and protecting the rights of the Data Subjects.
- Advising on Data Protection by Design and Default
- Advising on data retention / deletion policies and processes.
- Assisting on the performance of the annual refresher training on data privacy and the GDPR.
- Advising and assisting with respect to performing Data Processing Impact Assessments (DPIAs) and advising on risk mitigation.
- Advising with regards to maintaining the Data Privacy Records of Processing Register.
- Advising when necessary with regards to communication with Data Subjects when they send requests regarding their data.
- Advising on the GDPR implications for any new data processing activities.
- Advising on contractual obligations between the Data Controller and Data Processor as well as other supplier contracts.
- Advising in case of a Personal Data Breach, including training all relevant stakeholders, coordinators and managers.
- Provide advice as to any new provisions and/or updated legislation and/or regulation in Cyprus for the implementation of the GDPR.

28. Appendix C: Privacy Impact Assessment guidelines

A Privacy Impact Assessment (PIA) can be used to demonstrate that the system owners and functional management have applied data privacy controls throughout the system development lifecycle. In addition, performing a PIA for proposed changes identifies any conflicts between the post-implementation state and the privacy framework. For example, the PIA prior to introducing a new business application will identify if the way personal information is shared by the new application is in violation of the Data Privacy Policy.

A PIA should be triggered by events that significantly change the privacy environment of the company or if an existing process which significantly affects the privacy rights of data subjects is identified. For example, the introduction of new technology may change the manner in which personal information is stored and processed. In some cases, the technology may only collect personally identifiable information for a moment. For example, a security camera stream may capture the movements of an individual. While a record may not be maintained for later use, the initial capture and viewing may raise privacy concerns and a PIA could be required. Other instances of technology with privacy implications include: systems utilizing radio frequency identification devices (RFID), biometric scans, data mining, or location tracking.

In other cases, the technology may not be changing, but a program or system opts to use data from a new source such as a commercial aggregator of information. A PIA is required when such new sources of information are used.

The introduction of a new business process and notable changes to existing business processes may trigger a PIA for various reasons. New business processes may introduce new uses of personal information, new information systems and infrastructure supporting the changed processes, and new methods of collection, processing and disclosure. Some new business processes may require updates to agreements and contracts, potentially impacting the management of personal information.

At minimum, the following triggers should be considered:

PIA Trigger	**Description**
Digitization of records	Converting paper-based records to electronic systems.
Anonymous to Non-Anonymous	Operations performed on existing personal information database changes anonymous information into Sensitive Personal Information (SPI) or personal information (PII).
Significant System Management Changes	New uses of existing IT systems, including application of new technologies, significantly changes how SPI or PII is managed in the system. For example, when the company employs new relational database technologies or web-based processing to access multiple data stores, such additions could create a more open environment and avenues for exposure of data that previously did not exist.
Significant Merging	The company adopts or alters business processes so that databases holding PII are merged, centralized, matched with other databases or otherwise significantly manipulated. For example, when databases are merged to create one central source of information, such a link may aggregate data in ways that create privacy concerns not previously an issue.

PIA Trigger	Description
New User Access Mechanism	User-authentication technology (e.g., password, digital certificate, biometric) is newly applied to an electronic information system accessed by users (including Third Party users).
External Sources	The company systematically incorporates into existing information systems, databases of personally identifiable information purchased or obtained from third parties or public sources. An exception to this trigger would be merely querying such a source on an ad hoc basis using existing technology.
New Uses	Business partners work together on initiatives involving significant new uses or exchanges of information in identifiable form, such as marketing for products and solutions developed as joint ventures. In such cases, the CPO Group Data Privacy Officer should be consulted and prepare the PIA.
Internal Flow or Collection	Alteration of a business process that results in significant new uses or disclosures of information, including incorporation into the system of additional PII.
Alteration in Character of Data	New PII is added to a database or information collection and thus, raises the risks to personal privacy. For example, the addition of health or financial information may lead to additional privacy concerns that otherwise would not arise.
New Processes	Introduction of new business process that results in multiple triggers and changes to business agreements impacting management of personal information.

For a PIA performed on systems or projects prior to their implementation, responses to the PIA Questionnaire should be populated based on the planned system/ project specifications and processes.

29. Appendix D: Data breach response guidelines

The immediate response upon discovery of a data breach leading to compromise of personal information records should align with the information security incident response plan. This document provides guidelines on the procedural steps to be taken at minimum.

29.1. Incident reporting and tracking

- All privacy data breaches should be logged as incidents and [follow the incident reporting procedures] reported to the following individual [Margarita Anastasiou, Data Privacy Champion] with the information set out below to be provided. Please refer Incident Management Procedure for detailed actions.
- Ensure that the following information is captured:
  - Date of the incident
  - Time of the incident, if possible
  - Date and time when the incident was discovered
  - How the incident was discovered
  - Location of the incident
  - Suspected cause of the incident
  - The number of individuals whose data is affected

29.2. Breach containment and preliminary analysis

- Contain the breach and isolate the affected environment if possible.
- Notify the Privacy Coordinators and identify data subjects who will facilitate the investigation. The Data Privacy Officer (DPO) should lead the initial investigation or appoint an appropriate individual to act as a proxy.
- Identify the internal stakeholders who are affected by or involved in the data breach.
- Ensure that collection of incident information and evidences does not lead to accidental destruction of admissible evidence. Evaluate the risks associated with the data breach. [This should lead to identification of the following:
  - What personal information was involved
  - Extent of the data breach
  - How many data subjects were affected and who they are
  - What harm to the data subjects could result from the data breach
  - What harm to CPO Group could result from the data breach]
- If the data breach involves theft, cybercrime or other criminal activity, notify the police and Computer Emergency Response Team (CERT).

29.3. The DPO,in consultation of the legal support, should:

- Determine whether the Cyprus DPA need to be notified.
- Determine what details should be included in the DPA notification.
- Determine whether affected data subjects need to be notified of the data breach.
- Define how and when affected data subjects should be notified.
- Determine what details should be included in the notification.
- Determine what other external stakeholders should be informed (Governmental Agencies, professional bodies, supervisory authorities, etc.)]

30. Appendix E: Data privacy controls

Data privacy controls have been developed based on the privacy principles. These controls serve as a means to measure the extent of implementation of the Data Privacy Policy.

Principles	Privacy security control	Owner	Review frequency
Management	Data Privacy Policy is documented	Data Privacy Champion	Annual
	Data Privacy Policy is published and communicated to all CPO Group employees	Data Privacy Champion	Annual
	Consequences of non-compliance with Data Privacy Policy are periodically (at least annually) communicated to CPO Group' employees responsible for collecting, using, retaining and disclosing personal information	Data Privacy Champion	Annual
	Changes in privacy policies are communicated to CPO Group' employees shortly after the changes are approved	Data Privacy Champion	Annual
	Responsibility and accountability are assigned to an individual or group for developing, documenting, implementing, enforcing, monitoring and updating CPO Group Data Privacy Policy	Data Privacy Champion	Annual
	The names of the individual or group and their responsibilities for developing, documenting, implementing, enforcing, monitoring and updating Data Privacy Policy are communicated to CPO Group' employees	Data Privacy Champion	Annual
	Non-Disclosure Agreements (NDA) or Confidentiality Agreements are signed with CPO Group' employees who access personal information records as part of their job role	HR Department	On new employee Recruitment
	Data Privacy Policy and changes to it, are reviewed and approved by management	Data Privacy Champion	Annual
	Data Privacy Policy and associated procedures are reviewed and compared to the requirements of applicable laws and regulations at least annually and whenever changes to such laws and regulations are made.	Data Privacy Champion	Annual
	Data Privacy Policy and associated procedures are revised to conform to the requirements of applicable laws and regulations.	Data Privacy Champion	Annual

Principles	Privacy security control	Owner	Review frequency
	The Data Privacy Registry is developed and maintained. The types of personal information and sensitive personal information and the related processes, systems, and third parties involved in the handling of such information are identified in the Data Privacy Registry. Assets containing personal information records are classified as 'Confidential' and security controls are applied accordingly.	Data Privacy Champion	Annual
	A risk assessment process is used to establish a risk baseline and, at least annually, to identify new or changed risks to personal information and to develop and update responses to such risks.	Senior Management	Annual
	CPO Group internal personnel or advisors review contracts for consistency with Data Privacy Policy and associated procedures and address any inconsistencies.	Data Privacy Champion	On contract initiation
	Contracts are revised or amended to address identified inconsistencies with Data Privacy Policy and associated procedures	Data Privacy Champion	Annual
	The potential privacy impact is assessed when new processes involving personal information are implemented, and when changes are made to such processes (including any such activities outsourced to third parties or contractors), and personal information continues to be protected in accordance with the privacy policies. For this purpose, processes involving personal information include the design, acquisition, development, implementation, configuration, modification and management of the following (but not limited to): ▸ Infrastructure ▸ Systems ▸ Applications ▸ Web sites ▸ Procedures ▸ Products and services ▸ Data bases and information repositories Mobile computing and other similar electronic devices	Data Privacy Champion	Annual
	The use of personal information in process and system test and development is prohibited unless such information is anonymized or otherwise protected and authorized in accordance with CPO Group' Data Privacy Policy	Data Privacy Champion	Ongoing

Principles	Privacy security control	Owner	Review frequency
	A documented privacy incident and breach management program has been implemented. This should include, but is not limited to, the following: ▸ Procedures for the identification, management and resolution of privacy incidents and breaches ▸ A process to identify incident severity and determine required actions and escalation procedures ▸ A process for complying with breach laws and regulations, including stakeholder breach notification, if required ▸ An accountability process for employees or third parties responsible for incidents or breaches with remediation, penalties or discipline, as appropriate	Data Privacy Champion	Ongoing
	Procedures are established for the communication of privacy breaches in CPO Group to the affected data subjects, relevant authorities and internal stakeholders	Data Privacy Champion	Per case
	CPO Group' internal personnel with responsibility and/or accountability for privacy are empowered with appropriate authority and resources.	Senior Management	Annual
	A privacy awareness program is established to include the following: Information about the Data Privacy Policy and related matters provided to CPO Group' internal personnel Specific training for selected internal personnel depending on their privacy roles and responsibilities.	Data Privacy Champion	Annual
	For the jurisdiction in which CPO Group operates, the effect on privacy requirements from changes in the following factors is identified and addressed: ▸ Legal and regulatory ▸ Contracts, including service-level agreements ▸ Industry requirements ▸ Business operations and processes ▸ People, roles, and responsibilities ▸ Technology Privacy policies and procedures are updated to reflect changes in requirements.	Data Privacy Champion	Annual

Principles	Privacy security control	Owner	Review frequency
	The need to register/notify with data protection authorities in countries in which CPO Group has operations is assessed and existing registrations/notifications are reviewed.	Data Privacy Champion	Per case

Notice	Notice is provided to the individual about CPO Group Data Privacy Policy and associated procedures at collection or before the time personal information is collected, or as soon as practical thereafter	Data Privacy Champion	Annual
	Notice is provided to the individual about CPO Group Data Privacy Policy and associated procedures at the time these are changed or as soon as practical thereafter	Data Privacy Champion	Annual
	Notice is provided to the individual about the CPO Group' Data Privacy Policy and new purposes for personal information before their personal information is used for new purposes not previously identified.	Data Privacy Champion	Annual
	Data Privacy Policy is made available to data subjects (published on corporate website and at points of information collection)	Data Privacy Champion	Annual
	Data Privacy Policy is made available to data subjects (provided to external parties in hardcopy)	Data Privacy Champion	Annual
	Data Privacy Policy notifies data subjects of the personal information collected, purpose of collection, disclosure policy, and security practices.	Data Privacy Champion	Annual
	Data Privacy Policy describes the particular entities, business functions, locations and types of information to which the privacy policy applies	Data Privacy Champion	Annual
	Data Privacy Policy is in plain and simple language	Data Privacy Champion	Annual
	Data Privacy Policy is appropriately labelled and easy to locate (document should not be misleadingly or ambiguously labelled, link to privacy policy on the corporate website should be on the homepage or clearly designated location)	Data Privacy Champion	Annual

	Data Privacy Policy is linked to and displayed before all points of personal information collection	Data Privacy Champion	Annual

Choice and Consent	The privacy notice describes following in a clear and concise manner: ▸ Choices available to the individual regarding collection, use and disclosure of personal information. ▸ The ability of, and process for, an individual to change contact preferences. That explicit consent is required to collect, use, and disclose personal information, unless a law or regulation specifically requires or allows otherwise.	Data Privacy Champion	Annual
	Data subjects are notified of the consequences of denying or withdrawing consent to the collection and use of their personal information (e.g. certain services cannot be provided to the customer or certain IT resources cannot be made available without the collection of personal information)	Data Privacy Champion	Annual
	Explicit consent is obtained from the individual at or before the time personal information is collected or soon after. The individual's preferences expressed in his or her consent are confirmed and implemented. A record is maintained of all explicit consent obtained from data subjects.	Data Privacy Champion	Annual
	If information that was previously collected is to be used for purposes not previously identified in the privacy notice, the new purpose is documented, the individual is notified and explicit consent is obtained prior to such new use or purpose.	Data Privacy Champion	Annual
	Consent is obtained before personal information is transferred to/from an individual's computer or similar device.	Data Privacy Champion	Annual
	Data Privacy Policy addresses the collection of personal information	Data Privacy Champion	Annual
	Data subjects are informed that personal information is collected only for the purposes identified in the notice.	Data Privacy Champion	Annual

Collection	The types of personal information collected and the methods of collection, including the use of cookies or other tracking techniques, are documented and described in the privacy notice.	Data Privacy Champion	Annual

	Collection of personal information is limited to that necessary for the purposes identified in the privacy notice.	Data Privacy Champion	Annual
	Methods of collecting personal information are reviewed by management before they are implemented to confirm that personal information is obtained: (a) fairly, without intimidation or deception, and (b) lawfully, adhering to all relevant rules of law, whether derived from statute or common law, relating to the collection of personal information.	Data Privacy Champion	Annual
	CPO Group' management authority confirms that external parties from whom personal information is collected (that is, sources other than the individual) are reliable sources that collect information fairly and lawfully.	Data Privacy Champion	Annual
	External parties from whom personal information is collected (i.e. sources other than the individual) comply with the CPO Group Data Privacy Policy and contractual obligations with respect to their collection and transfer of personal information records on behalf of CPO Group	Data Privacy Champion	Annual
	Data subjects are informed if CPO Group develops or acquires additional information about them for its use.	Data Privacy Champion	Annual
	Data Privacy Policy addresses the use, retention, and disposal of personal information.	Data Privacy Champion	Annual
	Data subjects are informed that personal information is: (a) used only for the purposes identified in the notice and only if the individual has provided explicit consent, unless a law or regulation specifically requires otherwise; (b) retained for no longer than necessary to fulfil the stated purposes, or for a period specifically required by law or regulation, and (c) disposed of in a manner that prevents loss, theft, misuse or unauthorized access.	Data Privacy Champion	Annual

Use, Retention, and Disposal	Personal information is used only for the purposes identified in the notice and only if the individual has provided explicit consent, unless a law or regulation specifically requires otherwise.	Data Privacy Champion	Annual
	Retention schedule is defined for personal information, based on the duration of lawful business purpose for which personal information was collected	Data Privacy Champion	Annual

	Personal information is disposed as per the defined personal information retention schedule	Privacy Coordinator	Annual
	Data Privacy Policy addresses providing data subjects with access to their personal information.	Data Privacy Champion	Annual

Access	Data subjects are provided the means to request access to their personal information record in CPO Group' custody	Data Privacy Champion,	Annual
	The identity of data subjects is verified before providing access to their personal information records in CPO Group' custody	Data Privacy Champion,	Annual
	Personal information is provided to the individual in an understandable form, in a reasonable timeframe, and at a reasonable cost, if any.	Data Privacy Champion,	Annual
	Data subjects are informed, in writing, of the reason a request for access to their personal information was denied, the source of the entity's legal right to deny such access, if applicable, and the individual's right, if any, to challenge such denial, as specifically permitted or required by law or regulation.	Data Privacy Champion,	Annual
	Data subjects are provided the means to update their personal information in CPO Group' custody. Procedures are established for data subjects to correct or update their personal information.	Data Privacy Champion,	Annual
	Data Privacy Policy addresses the disclosure of personal information to external parties	Data Privacy Champion	Annual
	Data subjects are informed that personal information is disclosed to external parties only for the purposes identified in the notice and for which the individual has provided explicit consent unless a law or regulation specifically allows or requires otherwise.	Data Privacy Champion	Annual

Disclosure to Third Parties	Data Privacy Policy and other specific instructions or requirements for handling personal information are communicated to external parties to whom personal information is disclosed	Data Privacy Champion	Annual
	Personal information is disclosed to external parties only for the purposes described in the notice, and for which the individual has provided explicit consent, unless a law or regulation specifically requires or allows otherwise.	Data Privacy Champion,	Annual

	Personal information is disclosed only to external parties who have agreements with CPO Group to protect personal information in a manner consistent with CPO Group' Data Privacy Policy and security practices.	Data Privacy Champion,	Annual
	Procedures are established to evaluate that the external parties have effective controls to meet the terms of the agreement, instructions, or requirements.	Data Privacy Champion	Annual
	Non-Disclosure Agreements (NDA) or Confidentiality Agreements are signed with external parties before giving them access to personal information records in CPO Group' custody. The terms of agreement include clauses for remedial action in response to misuse or unauthorized disclosure of personal information by the external party, and CPO Group' right to audit the personal information protection controls implemented by the external party.	Data Privacy Champion	Annual
	CPO Group takes remedial action in response to misuse or unauthorized disclosure of personal information by an external party to whom personal information has been transferred.	Data Privacy Champion	Annual
	Data Privacy Policy (including any relevant security policies) addresses the security of personal information.	Data Privacy Champion	Annual
	Physical access is restricted to personal information in any form (including the components of CPO Group' information systems that contain or protect personal information).	Data Privacy Champion,	Annual

Security	Hardcopy personal information record storage is located in access-controlled areas	Data Privacy Champion,	Annual
	Privacy policies address the quality of personal information.	Data Privacy Champion	Annual
	Data subjects are informed that they are responsible for providing CPO Group with accurate and complete personal information and for contacting the entity if correction of such information is required.	Data Privacy Champion	Annual

Quality	Personal information is accurate and complete for the purposes for which it is to be used.	Data Privacy Champion	Annual
	Personal information is relevant to the purposes for which it is to be used.	Data Privacy Champion	Annual
	Privacy policies address the monitoring and enforcement of privacy policies and procedures.	Data Privacy Champion	Annual
	Data subjects are informed about how to contact the entity with inquiries, complaints and disputes.	Data Privacy Champion,	Annual

Monitoring and Enforcement	Each complaint is addressed, and the resolution is documented and communicated to the individual.	Data Privacy Champion,	Annual
	Compliance with Data Privacy Policy and associated procedures, privacy commitments and applicable laws, regulations, service-level agreements and other contracts is reviewed and documented and the results of such reviews are reported to management. If problems are identified, remediation plans are developed and implemented.	Data Privacy Champion,	Annual
	Annual privacy compliance reviews are conducted for business processes and supporting applications	Data Privacy Champion,	Annual
	Instances of noncompliance with privacy policies and procedures are documented and reported and, if needed, corrective and disciplinary measures are taken on a timely basis.	Data Privacy Champion,	Annual
	On-going procedures are performed for monitoring the effectiveness of controls over personal information based on a risk assessment and for taking timely corrective actions where necessary.	Data Privacy Champion,	Annual