

ABRIDGED DATA PRIVACY POLICY

April 2018



Document Control

Document Information

INFORMATION	
Document Id	NGAHR-02-P-04-2018-04
Document Owner	Head of Compliance and Privacy
Document Author	XXX XXX
Issue Date	March 2013
Last Saved Date	April 2019

Document History

VERSION	DATE	REVISED BY (INITIAL)	CHANGES
1.0	March 2013	XX	Creation of policy
1.1	March 2014	XX	Review of document;
1.2	March 2015	XX	Review of document;
1.3	March 2017	XX	Review of document; update of policy format;
2.0	April 2018	XX	Review of document; review of content and update for new legislation

Document Approvals

DEPARTMENT	REQUIRED [Y/N]	NAME OF APPROVER	APPROVAL DATE
SRM	N		
Compliance	Y	XXX XXX	April 2018
Technical Security	N		
GTAS	N		
Products	N		
Finance	N		
HR	N		
BCP	N		
Other	N		

TABLE OF CONTENTS

1 INTRODUCTION AND APPLICABILITY	1
2 OUR RESPONSIBILITY	2
3 DATA PRIVACY PRINCIPLES AND RIGHTS.....	3
4 COOKIES AND THIRD-PARTY DATA.....	4
5 INTERNATIONAL DATA TRANSFERS	5
6 DATA RETENTION	6

1 INTRODUCTION AND APPLICABILITY

An essential activity within NGA Human Resources ('NGA', 'we', 'us', 'our') is the requirement to gather and process personal data about our employees ('you') and our client's employees, in order to operate effectively and provide our services. This will be done in accordance with the applicable data protection and/or privacy laws of the countries in which we operate.

The [General Data Protection Regulation](#), when effective and applicable, will be used as the best practice standard in countries **where there is no equivalent** data protection and/or privacy law or regulation.

Local legislation may require a specific implementation of this corporate policy to align with local legal requirement(s).

Compliance with this policy is mandatory for all NGA HR employees, including contractors and temporary employees.

This policy is also applicable to our vendors and partners.

2 OUR RESPONSIBILITY

This policy applies to all entities in the NGA Human Resources group of companies, its subsidiaries and affiliates as well as associated companies.

Where local amendments of this corporate policy need to be put in place, this must align with the Corporate Policy Governance Process, unless there is a specific legal obligation that requires a different implementation. Should that be the case, the legal obligation must be clearly highlighted and explained in that local amendment.

This policy sets the requirements to ensure that we:

- Comply with applicable data protection and privacy law and follow good practice;
- Protect the rights of our employees, clients and their employees and our partners;
- Are open about how we store and process your data; and
- Protect ourselves from the risks of a data breach.

When acting as custodian of personal data, we have a legal and contractual duty to ensure that the data is handled properly and securely at all times, irrespective of whether it is held in electronic or physical form. This covers the whole data lifecycle, including:

- The obtaining of personal data;
- The storage and security of personal data;
- The use of personal data; and
- The disposal/destruction of personal data.

This policy applies to all personal data that is processed by us, including personal data of our client's employees.

It is everyone's responsibility to protect personal data and prevent it from being accessed, lost, deleted or damaged unlawfully or without proper authorization.

We must ensure on a minimum that:

- Only individuals who are authorized to use information can access it;
- Information is accurate and suitable for the purpose for which it is being processed;
- Authorized persons can access information if they need it for authorized purposes; and
- Personal data is never stored or transported on a laptop, mobile phone or removable storage device, nor sent unencrypted through any channel (unless a recorded exception applies).

Should we become aware of a security incident, we will follow our established Security Incident Management Process.

3 DATA PRIVACY PRINCIPLES AND RIGHTS

To comply with the law, we must abide by the following data privacy principles when processing personal data:

- Process lawfully, fairly and transparently;
- Process for a specific reason (purpose limitation);
- Process on a limited basis (data minimization);
- Process accurately and ensure that data is up-to-date;
- Process for a limited period of time (storage limitation);
- Process with integrity and confidentiality; and
- Process securely.

These principles are internationally accepted principles of data protection, and are not intended to, nor do they, replace existing and applicable national law.

These apply in all cases as long as there is no conflict with the respective national law. National law applies in the case that it entails a mandatory deviation from, or exceeds the scope of, this policy for data protection.

It should also be noted that data can only be processed where one of the following conditions has been satisfied:

- The individual has given consent to the processing of his/her data;
- The processing is necessary for the performance of a contract with the individual;
- The processing is required under a legal obligation;
- The processing is necessary to protect the vital interests of an individual or to carry out public functions; and
- The processing is necessary to pursue the legitimate interests of the business (unless they are prejudicial to the interests of the individual).

NGA processes data where we gained consent from the individual, when it is required under a legal obligation or under legitimate interests. We also process data to fulfil our contractual agreements with clients and third parties.

Individuals have certain rights that can be exercised to protect personal data. These rights are the following and we must ensure that these can be exercised, free of charge:

- **Right to be Informed:** You have the right to receive certain minimum information from us about the processing that we perform;
- **Right of Access:** You have the right to receive a copy (or access to) your personal data at any time;
- **Right of Rectification:** You have the right to correct incorrect or incomplete data that we hold on you;
- **Right to Erasure:** You have the right to request the deletion of your data, under certain circumstances;
- **Right to Restrict Processing:** You have the right to block the processing of your data under certain circumstances;
- **Right to Data Portability:** You have the right to request your data to be transferred to another Data Controller, under certain circumstances;
- **Right to Object:** You have the right to object to the data processing, under certain circumstances; and
- **Rights in Relation to Automated Decision Making and Profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling.

Every individual has the right to lodge a complaint with a Data Protection Authority should we fail to comply with them.

4 COOKIES AND THIRD-PARTY DATA

Our website uses cookies to distinguish one user from other users of our website. This helps us to provide users with a good experience when a user browses our website and allows us to improve our site.

NGA has a separate cookie policy, which can be consulted on our website here:
<http://www.ngahr.com/cookie-policy>

When acting as the Data Controller, we might collect data directly from a third party (e.g. through our websites, events, webinars, etc) or automatically (e.g. IP address, browser type, browser version, etc) or through other sources (e.g. our clients or third-party providers).

This data will be processed in accordance with this policy. Additional information can be read on our [Privacy Notice](#) on www.ngahr.com.

5 INTERNATIONAL DATA TRANSFERS

International data transfers from countries of the EU or the EEA to countries outside the EU/EEA, which do not provide an adequate level of protection, require that one of the following (not exhaustive) conditions is met, to provide appropriate safeguards for personal data:

- Consent of the individual concerned;
- Binding Corporate Rules;
- Standard data protection clauses, approved by the EU Commission (i.e. EU Model Clauses; Standard Contractual Clauses), including these adopted by any national data protection authority;
- An approved Code of Conduct; or
- An approved certification mechanism.

This does not apply to international data transfers within the EU/EEA or to non-EU/EEA countries that are deemed to provide an adequate level of protection for the processing of personal data.

Within our group of companies, we may transfer data across the globe to our various service delivery locations and offices. Depending on the type of data and the type of processing that is required or processed, this may include our vendors and partners.

We rely on EU Model Clauses/Standard Contractual Clauses as the basis for our international data transfer agreements, both internally and externally.

We have signed an intra-company data transfer agreement between our various entities and affiliates, based on the EU Model Clauses.

6 DATA RETENTION

When processing our client's employee data, we are acting as the Data Processor, and as such we do not decide about data retention and destruction of their data.

We process data, including data retention and destruction, in accordance with contractual requirements, and the relevant account management representative is the owner of that process.

For our data retention, we have established a Data Retention Policy.

NGA Human Resources is a global leader in helping organizations transform their business-critical HR operations to deliver more effective and efficient people-critical services.

We help our clients become better employers through smarter, more streamlined business processes — to save money, manage employee life cycles, and support globally connected, agile organizations. This is how NGA makes HR work.

What sets us apart is The NGA Advantage. It's a combination of deep HR experience and insight, advanced technology platforms and applications and a global portfolio of flexible service delivery options.

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