

Data Management Policy

Belisama holds personal data about our employees, clients, vendors, partners and other individuals for a variety of business purposes – some on behalf of our clients. We collect and store any information you enter on our website and may use software tools to collect and analyse session information during your visit for the purpose of improving our design. We also hold current and historical System and Configuration data, which consists of configuration, performance, design and other data harvested in the course of analysing or sizing customer environments.

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1.1 Definitions

Business purposes

The purposes for which personal data may be used by us:

Personnel, Administrative, Financial, Payroll, Regulatory and Business Development.

The purposes for which system and Configuration data may be used by us:

System audits, sizing, trend analysis, problem determination, availability reviews and security audit.

Controlling and processing

Belisama is both a controller and processor of data.

Personal Data

Any information relating to an individual. This includes information of a sensitive nature (such as health, political and religious views etc).

System and Configuration Data

Functional specifications and designs; system logs and traces; configuration files; security settings; historical trends and performance reports; network and storage design. Belisama will treat all Systems and Configuration Data as if it were Personal Data.

Originator

The individual or entity that generated or received the information.

Unofficial data

No damage is this information is compromised.

Official data

No or insignificant damage if this information is compromised.

Confidential data

There will be limited or greater damage to an individual or organisation if this information is compromised.

1.2 Scope

This policy applies to all the staff at Belisama and the director can be contacted for further information about this policy if necessary. Belisama will determine from time to time which member of staff shall be the designated Privacy Officer.

1.3 Principles

Belisama staff shall comply with the principles of data protection described in the EU General Data Protection Regulation. The principles are:

Lawful, fair and transparent

Data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.

Individuals and Companies will be advised when and under what circumstances data is collected.

Individuals and Companies will be given the option and assistance if required to anonymise their data prior to providing to Belisama.

Belisama Data Management policy will be kept clear, concise and up to date.

Limited for its purpose

Data can only be collected for a specific and defined purpose.

Data minimisation

Any data collected must be necessary and not excessive for its purpose.

Accurate

The data we hold must be accurate and kept up to date.

Retention

We cannot store data longer than necessary and it will be destroyed at the end of the project or retention period.

Integrity and confidentiality (security)

The data we hold must be kept safe and secure.

Access to information will be limited to authorised staff for approved purposes.

A classification of Confidential is only applied to information (or an asset that holds information) if it requires protection because a compromise of the information would have a not insignificant impact.

Accountability

We are responsible for complying with these principles and accountable for any processing and able to demonstrate compliance.

Disclosure

Approval will be sought before disclosing any Individual or Company data to a 3rd party. The transfer of information to a cloud storage provider is not considered disclosure.

1.4 Our Procedures

Fair and Lawful processing

We will process all data fairly and lawfully and will not process data unless the individual or company whose details we are processing has consented. No data can be provided to a third party for processing without written consent of the Individual or Company.

If our processing does not conform, that data will be erased.

1.5 Belisama responsibilities

- Regularly review our Data Management Policy and Procedures and ensure that Staff review and follow the procedures;
- Analysing and documenting the type of data we hold. The originator must decide whether the information is Unofficial, Official or Confidential;
- Checking procedures to ensure they cover all the rights of the individual or company;
- Identify the lawful basis for processing data;
- Ensuring consent procedures are lawful;
- Implementing and reviewing procedures to detect, report and investigate data breaches;
- Store data in safe and secure ways consistent with the classification of the data;
- Assess the risk that could be posed to individual or companies rights and freedoms should data be compromised;
- Conduct an annual reviewing all data protection procedures;
- Arranging data protection training and advice for all staff members and those included in this policy;
- Answering questions on data protection from staff, partners, customers, vendors and other stakeholders;
- Responding to individuals such as clients and employees who wish to know what data is being held on them by us;
- Checking and approving with third parties that handle our data, any contracts or agreement regarding data processing;
- Ensure all systems, services, software and equipment meet acceptable security standards;
- Checking and scanning security hardware and software regularly to ensure it is functioning properly;
- Approving data protection statements attached to emails and other marketing material; and
- Addressing data protection queries from clients, target audiences or media outlets.

1.6 Staff responsibilities

Primarily Staff will be responsible for familiarising themselves with the Belisama Data Management Procedures and treating data according to its classification level. In particular:

Accuracy and Relevance

Ensure that any data we process is accurate, adequate, relevant and not excessive given the purpose for which it was obtained.

Data Security

Keep the data secure against loss or misuse.

Data Retention

Not retain data for any longer than necessary. What is necessary will depend on each case taking into account the reason for which the data was obtained.

Transferring data internationally

Follow the restrictions covering the international transfer of data. Data must not be transferred abroad with permission from the Individual or Company.

1.7 Rights of the Individual / Company

Right to be informed

Individuals and companies have the right to be informed if Belisama collects any Personal or System and Configuration data.

Access requests

An individual or company has the right to receive confirmation that their data is being processed and access their data or any supplementary information derived from it.

Accuracy of information

If any Individual or Company believes that believes that any of their data held by Belisama is not accurate, incomplete, out of date or misleading, please contact the Director or privacy officer.

Right to erasure

Individuals and companies have the right to have their data erased after processing has ceased:

- When the data is no longer necessary in relation to the purpose for which it was collected;
- Where consent is withdrawn; and
- Where the data was unlawfully processed.

1.8 Reporting Breaches

Relevant Agencies

- Singapore (Personal Data Protection Commission).
- The relevant Data Protection Agency in the Country of operation of the Client.

Any breach of this Policy or of the Data Protection Laws must be reported as soon as practically possible to the Privacy Officer or the Director, who will then report breach to the office above for the relevant country.

Any member of staff that fails to notify of a breach, or is found to have known or suspected a breach has occurred may be liable to disciplinary action.

If you have any further questions or if you wish to receive more information on our Data Practices and our Privacy Policy, please contact our Privacy Officer: privacy@Belisama.com

Antony Steel

Belisama

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