

## INFOTECH SERVICE FZ-LLC PRIVACY COMPLIANCE OVERVIEW

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### 1. Introduction

INFOTECH SERVICE FZ-LLC is committed to ensuring the privacy and security of personal data in compliance with applicable global data protection laws, particularly the **EU General Data Protection Regulation (GDPR)** and other local privacy regulations.

Since 2024, INFOTECH SERVICE FZ-LLC has implemented a global privacy compliance program to protect personal data across its services and operations.

### 2. Program Overview

The privacy compliance program is overseen by the **Group Data Protection Officer (DPO)** and the **Chief Information Security Officer (CISO)**. It is supported by local data protection ambassadors and security officers across all INFOTECH SERVICE FZ-LLC business units.

The program includes:

- **Employee Training:** Regular training sessions for all employees on data protection principles.
- **Privacy by Design:** Integration of GDPR principles such as **data minimization** and **privacy by default** into all projects from inception.
- **Data Protection Policies:** Dissemination of internal policies governing personal data processing and usage for both employees and external partners.
- **IT Charter:** A charter outlining the responsibilities of system users in processing personal data and consequences for breaches.
- **Record Maintenance:** Ensuring accurate records of processing activities are kept.
- **Incident Reporting:** Procedures for reporting data breaches and notifying relevant supervisory authorities when necessary.

### 3. Key Compliance Measures

The following technical and organizational measures are aligned with **ISO 27001** standards to ensure security and confidentiality:

- **Access Management:** Controlled access policies to restrict data use to authorized personnel only.
- **Third-Party Data Handling:** Contracts with third-party processors are aligned with GDPR standards, requiring a **Security Insurance Plan (SIP)**.
- **Security Monitoring:** Systems for detecting unauthorized access and misuse of personal data.

- **Data Deletion and Archiving:** Secure archiving and deletion processes, with regular testing of backups.
- **Application Security:** Implementation of security measures such as vulnerability assessments and periodic updates to prevent breaches.
- **Physical Security:** Use of alarms, intrusion detection systems, and physical barriers to protect data processing environments.

#### **4. Audits and Controls**

INFOTECH SERVICE FZ-LLC conducts regular **internal audits** to assess the compliance of data processing activities. Critical processes, such as HR and client databases, are subject to heightened monitoring.

Contracts with external partners are designed to ensure adherence to data protection laws, and processors must demonstrate compliance with GDPR, including ISO certifications.

#### **5. Conclusion**

INFOTECH SERVICE FZ-LLC's privacy compliance efforts ensure that all personal data processed within the organization is secure and handled in accordance with global data protection standards.

This document captures the core elements of INFOTECH SERVICE FZ-LLC's commitment to privacy compliance, including its measures for data protection, management, and breach handling.