

Compliance Department Policy



Data Protection

Contributors

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Documentation Approval

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Documentation Change History

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1.0	19-April-2022	New Policy	Monisha Banerjee
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Contents

Introduction	4
Policy	5
Definitions	6
Scope	7

Introduction

This Data Protection Policy sets out how TGT handles the Personal Data of individuals, be they Personnel, customers, suppliers or other third parties. This policy applies to all Personal Data that we Process. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we must always take seriously. We are exposed to potential fines for failure to comply with the provisions of the GDPR.

Policy

1. We adhere to the data protection principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:
 - Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
 - Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
 - Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
 - Accurate and where necessary kept up to date (Accuracy).
 - Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
 - Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction, or damage (Security, Integrity and Confidentiality).
 - Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
 - Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subjects Rights and Requests).
2. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.
3. Any employee who violates this policy will be subject to disciplinary proceedings including up to termination of employment.
4. If any employee has any concern regarding implementation of this policy, then employee must promptly raise his/her concern either to Chief Compliance Officer or pursuant to the TGT Whistleblowing Policy.

Definitions

1. **Data Subject:** a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.
2. **Data Privacy Manager:** is the person with responsibility for data protection compliance.
3. **General Data Protection Regulation (GDPR):** the General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.
4. **Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location, or date of birth) or an opinion about that person's actions or behaviour.
5. **Personnel:** all directors, officers, employees, staff members, agents, consultants, and representatives of TGT.
6. **Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording, or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing, or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.
7. **Pseudonymisation or Pseudonymised:** replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.
8. **Register of Systems:** a register of all systems or contexts in which personal data is processed by TGT.
9. **Sensitive Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

Scope

This procedure applies to all directors, officers, employees, staff members, agents, consultants and representatives of TGT. If an individual is uncertain about how this procedure might affect his or her activities or has any questions, he or she should contact the Data Privacy Manager or the Chief Compliance Officer.