

Fostering trust in
the digital transformation

GFT Group Data Protection Policy (Extract)

Owner:

Group Data Protection

Version:

3.3 (Extract)

Date of Publication:

23 December 2022

Classification:

Extract: Public

Full Document: Internal



Table of contents

1	Objective, Purpose and Scope	6
1.1	GFT Group Data Protection Framework	7
1.2	GFT Group Values & Statement	7
1.3	Data Protection Risk Stage Model	9
1.4	Global & Local Policies	9
1.5	Data Protection & Information Security	10
1.6	Accountability	10
1.7	GFT Group Data Protection Network	11
2	Data Protection Principles	12
2.1	Lawfulness, Fairness and Transparency	12
2.2	Purpose Limitation and Accuracy	13
2.3	Security of Processing of Personal Data	13
2.4	Data Minimization	14
2.5	Storage Limitation and Data Retention	14
3	Data Protection Practices	15
3.1	Special and Sensitive Categories of Personal Data	15
3.2	Special Types of Processing of Personal Data	15
3.3	Rights of the Data Subject	16
3.4	Disclosure of Personal Data to Third Parties	17
3.5	Commissioned Data Processing	17
3.6	Technical and Organisational Measures	17
3.7	Non-Compliance Handling	18
3.8	Duty to Inform	19
3.9	Training & Awareness	19
3.10	Data Breach Handling	20
3.11	Proactive Practices	21
3.12	Privacy by Design & by Default	22

1 Objective, Purpose and Scope

The objective of the GFT Group Data Protection Policy is to explain the framework of the GFT Group which establishes and maintains an adequate and common level of Data Protection within the GFT Group and at GFT Group’s interfaces to clients, suppliers and partners. The underlying purpose is to support GFT Group’s global delivery model in GFT and to ensure efficient and standardized processing in Corporate Services in compliance with legal requirements in Data Protection and in recognition of the rights and freedoms of the data subjects. GFT Group considers Data Protection as integral part of its everyday business operations.

The scope of the GFT Group Data Protection Policy is global that means it covers all types of GFT Group



operations in all business functions and processes, all legal units directly or indirectly affiliated with GFT Technologies SE, all countries where GFT Group is maintaining operations. In particular, the GFT Group Data Protection Policy¹ is relevant for those countries which do not have in place a Data Protection related legislation and/or an acceptable level of Data Protection as defined by the European Commission.

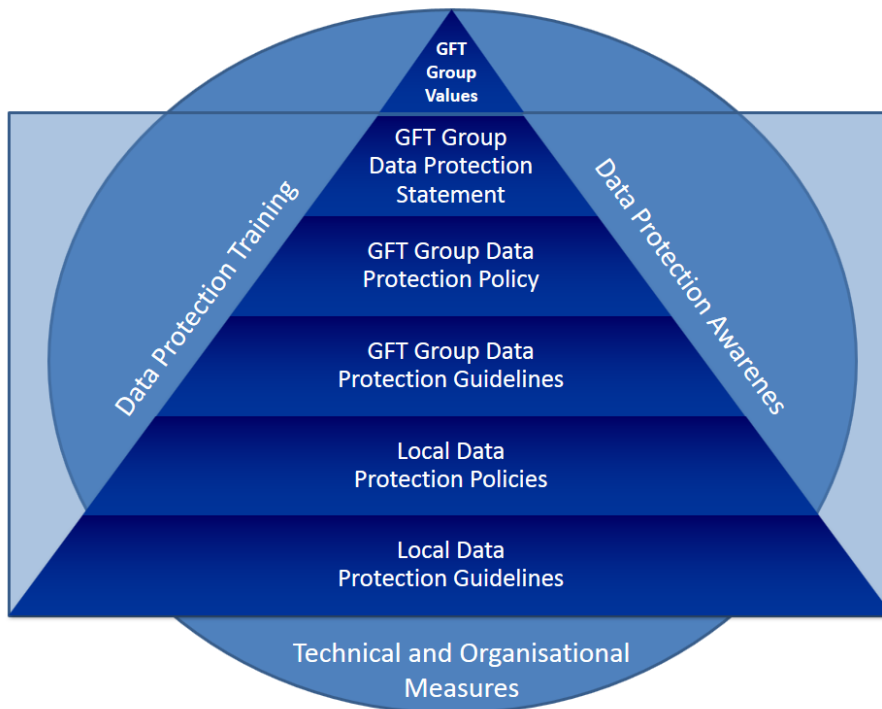
The notions of "Data Protection" and "Privacy" used throughout this document refer to the handling of legal requirements which regulate the processing of personal data. The term 'personal data' means any information relating to a 'data subject'. A 'data subject' represents an identified or identifiable natural person.

The term 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Further terms and explanations are provided in the GFT Group Data Protection Glossary.

¹ guidance for implementing the GFT Group Data Protection requirements in those countries will be given in the corresponding Local Data Protection Policies (if appropriate)

1.1 GFT Group Data Protection Framework

The GFT Group Data Protection Policy is not a self-contained document but is the core element of GFT Group Data Protection Framework which based on a value driven approach made fast at the GFT Group Values and the GFT Group Data Protection Statement. Policy and Guidelines issued by Group Data Protection represent the core of the GFT Group Data Protection Framework which may be amended by Policies and Guidelines issued by Local Data Protection (if appropriate).

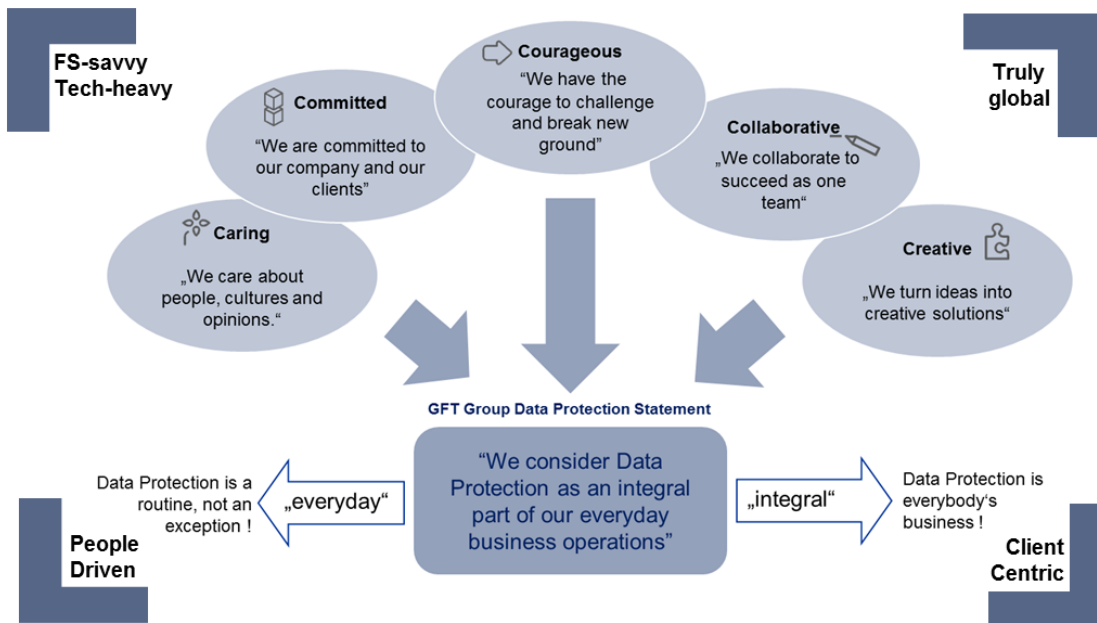


Revisions of the GFT Group Values have to be approved by the GFT Administration Board and the Group Executive Board. Revisions of the GFT Group Data Protection Statement and major versions of the GFT Group Data Protection Policy have to be approved by the Group Executive Board, Privacy and Security Steering Committee and Privacy Officer Committee. Minor versions of the GFT Group Data Protection Policy have to be approved by Group Data Protection. Major versions of Group Data Protection Guidelines have to be approved by the Privacy Officer Committee. Minor version of Group Data Protection Guidelines have to be approved by Group Data Protection. Any Local Data Protection Policy or Guideline has to be approved by Local Data Protection responsible and the Chief Privacy Officer.

All elements of the GFT Group Data Protection Framework are described in the GFT Group Data Protection Guideline for the Data Protection Framework.

1.2 GFT Group Values & Statement

GFT Group values are common principles in the area of teamwork, client relationships and working environment and represent the cornerstone of GFT Group's company culture. Combined with a clear vision, they are the basis for GFT Group's long-term growth and success. GFT Group's vision in Data Protection is summarized in the GFT Group Data Protection Statement which is built on the GFT Group values:



"Integral" means that Data Protection is everybody's business and describes a work habit which do consider Data Protection not just at the end, but in the beginning and all along each relevant business process and is also known as "Data Protection by Design and by Default". "Everyday" emphasizes the fact that Data Protection is not only relevant in extraordinary projects but in daily routines in particular.