

Summary

The Data Protection Policy establishes the guidelines for the protection of personal data at Clue Digital and its related companies. It outlines the regulations for protecting personal data, including any applicable GDPR requirements.

Clue Digital takes personal data protection seriously and handles personal data with due care and responsibility when conducting business. A personal data breach might have major legal and financial repercussions for Clue Digital, its staff, and the data subjects. Additionally, it can harm Clue Digital's reputation. There will be no risks of data breach due to the implementation of the Data Protection Policy throughout Clue Digital.

Applicability

This Data Protection Policy applies to all personal data processing in [GDPR](#) and is binding on Clue Digital and their personnel.

Procedure and Competencies

The following articles outline the steps Clue Digital takes to process personal data.

In addition, they offer a succinct explanation of how the essential roles and capabilities within Clue Digital's personal data processing division are divided up.

1.1 General Obligation

In order to maintain the safety of the personal data against abuse, loss, and damage, Clue Digital has taken and will continue to take suitable technical and organizational measures. The data protection policy is applicable to the processing of personal data belonging to partners, employees, and their families, as well as job seekers, clients, and other people whose personal data are processed by Clue Digital.

1.2 Basic Principles of Personal Data Protection

In the processing of personal data, Clue Digital adheres to the fundamental principles which are presented below:

- Lawfulness principle – at least one lawful basis has to be determined prior to processing personal data;
- Principle of limitation by purpose – process the personal data only for pre-defined purposes.
- Data minimization principle – processing of only necessary, relevant and adequate personal data for any legitimate purpose.
- Correctness and transparency principle – open and transparent processing to the data subjects.
- Integrity and confidentiality principle, application of the “need to know” principle – implementation of necessary organizational and technical measures in order to ensure the restriction of access to the personal data to prevent unauthorized or unlawful processing.
- Accuracy principle – processing of accurate and up-to-date personal data.
- Controlled change management regime – a change of the current processing system to a new method is subject to controller’s consideration and a potential subsequent preparation of the Data Privacy Impact Assessment.
- Definition of roles participating in the personal data protection in the Clue Digital.

1.3 Lawful Bases and Personal Data Processing Purposes

Personal data processing is always based on lawful bases, which include the consent to personal data processing, compliance with a legal obligation, the performance of a contract, the legitimate interest, the public interest or the protection of the interests of the data subject.

1.4 Personal Data Transfer

Clue Digital may only make personal data available to third parties under limited conditions (including inside the group). Personal data may be made available to a third party acting as a processor only if a personal data processing agreement is in place. Depending on the applicable contractual arrangements, another third party acting as a controller may also have access to personal data.

Clue Digital must, under certain conditions, inform the relevant third parties to whom the personal data were made available of any requests for the rectification or erasure of the personal data or for processing limits, unless doing so is impractical. Clue Digital exclusively informs a data subject about the third parties to whom the relevant personal data were shared if the data subject requests it.

1.5 Rights of Data Subjects

Clue Digital takes all necessary precautions to protect data subjects' rights. Data subjects have rights in relation to personal data processing, which include the right to access personal data, the right to rectification, processing limitation, portability, or erasure of personal data, the right to object



to personal data processing, and the right not to be subject to a decision based solely on automated personal data processing.

Data subjects can exercise their rights by submitting a written or oral request. Clue Digital has implemented the following criteria for the verification of the identity of the data subjects in order to adequately secure the personal data it processes and to avoid misuse of that data.

Written request

The data subjects must fill out the request form in order to request the written exercise of the specific right. The signatures of the data subjects on the request form must be authenticated in writing.

Oral request

The exercise of a data subject's right may also be requested in person. The specific appointed employee will use one of the following documents—a personal ID card, a passport, or another official document with a sufficiently clear photo to enable your clear identification—to verify the applicant's identity.

The exercise of data subjects' rights shall not infringe on the rights of other parties.

Clue Digital ensures proper communication and collaboration in order to process all received requests in a timely manner. Clue Digital works directly with the concerned data subject to deliver a response.

1.6 Roles and Responsibilities

Clue Digital is accountable for ensuring that the General Data Protection Regulations are followed. [GDPR](#)

1.7 DPO

A Data Protection Officer (DPO) has been appointed by Clue Digital with the functional and organizational responsibility for adhering to the external and internal rules of the GDPR regarding the protection of personal data.

Marwa.medhat@clue-digital.com E-mail can be used to contact the DPO.

1.8 Responsibilities of Data Owners and of All Employees

All Clue Digital data owners and employees are required to process personal data in accordance with the Clue Digital's internal policies and General Data Protection Regulations.

1.9 Notification of a Personal Data Breach

Any alleged violation of the security of personal data is immediately, and in any case, within 24 hours, reported to the DPO by Clue Digital. If the breach of personal data meets the requirements for reporting to the relevant supervisory authority and/or data subjects, the DPO fulfils this obligation within 72 hours of the breach of personal data.

1.10 Personal Data Erasure

Clue Digital only keeps personal data for as long as it is necessary. Personal data are erased or anonymized in the following situations:

- Expiration of the purpose of the personal data processing without any other legitimate purpose for replacement.
- Personal data are not further needed for the purpose for which they were processed.
- Withdrawal of the data subject's consent without any other lawful basis for processing.
- Objection of the data subject against the processing without any other prevailing justified reasons; and
- Unlawful processing of personal data.

Clue Digital prioritized observance of appropriate security procedures during erasure or anonymization.

1.11 File Management

Clue Digital follows [GDPR](#) guidelines while handling documents. The current retention policies outline the procedures for receiving, registering, transferring, storing, and deleting documents in Clue Digital.

When the archiving term expires, the papers are destroyed using the established shredding method, with a record of the destruction (approval of the document owner, approval of the relevant state regional archive, certificate of shredding).

1.12 Personal Data Publishing in Public Media and the Internet



CLUE digital

Clue Digital may publish personal data on the Internet or in other media only with the consent of the data subject in question, unless there is another legal basis in specific cases.

1.13 Information on Personal Data Processing

If Clue Digital obtains personal data relating to data subjects directly from these data subjects, these data subjects are informed about the processing of their personal data at the time such personal data is obtained. If personal data are not obtained directly from data subjects, processing information is provided to them later, usually during the initial contact with the subject.

Appendix no. 1 – Request Form

CLUE-Digital Data Subject Request Form

- **Identification of entity being addressed by this request**

Identification number:	Company name:
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- **Identification of data subject / representative**

First Name:	Last Name:	Title:
Date of birth:	Birth name:	
City	Country:	ZIP:
Street:		Number:
Type of identification document:		
Number of identification document:		

- **Identification of data subject's representative (to be filled in only in case of representation)**

Name:	Surname:	
Company name:		
Date of birth:	Identification number:	Country:
City		ZIP:
Street		Number:
Representation Document:		

- **Alternative identification (not required)**

● Email:

- **Description of data subject's request (what is data subject requesting)**

Date:

Verified signature:

In case of any questions in relation to the CLUE DIGITAL requests kindly contact us by e-mail at Marwa.medhat@clue-digital.com (DPO).