DATA PROCESSING POLICY

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1. Purpose

The purpose of this Data Processing Policy is to ensure that ITEC Ltd handles personal and business data responsibly, ethically, and in accordance with applicable laws and regulations. It outlines the company's principles and practices for processing data, particularly personal data of customers, employees, and third parties.

2. Scope

This policy applies to all employees, contractors, vendors, and partners who process data on behalf of ITEC Ltd. It covers all forms of data—digital and physical—and all systems used in processing, including cloud platforms, CRM tools, servers, and employee devices.

3. Definitions

- ✓ **Personal Data:** Any information relating to an identified or identifiable individual.
- ✓ **Processing:** Any operation performed on data, whether automated or manual, such as collection, storage, use, transfer, or deletion.
- ✓ **Data Subject:** The individual whose personal data is being processed.
- ✓ **Data Controller:** The party that determines the purposes and means of data processing.
- ✓ **Data Processor:** A party that processes data on behalf of the Data Controller.

4. Legal Basis for Processing

ITEC Ltd ensures that all data processing activities are based on at least one of the following legal grounds:

- ✓ Consent from the data subject.
- ✓ Fulfillment of a contract.
- ✓ Compliance with a legal obligation.
- ✓ Protection of vital interests.
- ✓ Legitimate interests pursued by the company or a third party.

5. Principles of Data Processing

ITEC Ltd adheres to the following principles:

- ✓ **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and in a transparent manner.
- ✓ **Purpose Limitation:** Data is collected for specified, legitimate purposes and not further processed in a way incompatible with those purposes.
- ✓ **Data Minimization:** Only data necessary for processing is collected.
- ✓ **Accuracy:** Data must be accurate and kept up to date.
- ✓ **Storage Limitation:** Data is kept only for as long as necessary.
- ✓ **Integrity and Confidentiality:** Data is processed in a manner that ensures appropriate security.
- ✓ **Accountability:** The company is responsible for and must be able to demonstrate compliance with these principles.

6. **Categories of Data Processed**

The company may process the following categories of data:

- ✓ **Customer Data:** Name, contact information, billing details, service usage, etc.
- ✓ **Employee Data:** Payroll, performance, contact details, benefits.
- ✓ **Vendor Data:** Business name, contract terms, payment info.
- ✓ **Technical Data:** IP addresses, login data, location, browser type, etc.

7. **Data Collection and Use**

- ✓ Data is collected directly from individuals or through trusted partners or platforms.
- ✓ Collected data is only used for the purposes communicated at the time of collection, such as service delivery, customer support, internal analytics, and legal compliance.

8**. Data Retention**

- ✓ Personal data is retained only as long as necessary to fulfill the stated purpose or as required by law.
- ✓ After the retention period, data will be securely deleted or anonymized.

9. **Data Sharing and Third Parties**

- ✓ Data may be shared with third parties only under strict contractual obligations (e.g., Data Processing Agreements).
- ✓ Third-party service providers (e.g., hosting, analytics, CRM platforms) must comply with equivalent data protection standards.
- ✓ International data transfers will only occur if the destination country ensures an adequate level of protection or suitable safeguards are in place.

10. **Data Subject Rights**

ITEC Ltd respects the rights of data subjects and ensures they can exercise them, including:

- ✓ **Right to access** their personal data.
- ✓ **Right to rectification** of inaccurate or incomplete data.
- ✓ **Right to erasure** ("right to be forgotten").
- ✓ **Right to restrict or object** to processing.
- ✓ **Right to data portability.**

Requests will be responded to within the legal timeframe (e.g., 30 days under GDPR).

11**. Data Security Measures**

- ✓ Implementation of encryption, secure storage, firewalls, and intrusion detection systems.
- ✓ Role-based access control to limit who can access personal data.
- ✓ Regular audits and vulnerability assessments.
- ✓ Secure coding and software development practices.

12. **Breach Notification**

In case of a data breach:

- ✓ The incident must be reported immediately to the MD-ITEC LT.
- ✓ Data subjects and relevant authorities will be notified as required by law.
- ✓ Remedial actions will be taken promptly to contain and resolve the issue.

13. **Training and Awareness**

All employees involved in data processing must undergo regular data protection training and adhere to internal guidelines and procedures.

14**. Data Processing Agreements (DPAs)**

When acting as a data processor, ITEC Ltd enters into DPAs with all data controllers. These agreements define the responsibilities, security measures, and limitations on data use.

15. **Compliance**

This policy is aligned with the following regulations:

- **General Data Protection Regulation**– RWANDA

16. **Review and Updates**

This policy is reviewed annually or upon significant changes in data protection law, processing activities, or technology.

SIGNED BY ITEC LTD
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