

EU Data Protection Compliance Policy

Description of the Document -

This document provides a brief description of the EU Data Protection Compliance Policy aspects at EXCELSOFT.

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1. Objective

This Privacy Statement outlines the Excelsoft Technologies Limited's (hereinafter referred to as "Excelsoft") approach to the collection and processing of Personal Information through various sources. While the primary focus is on data gathered via our websites and applications. The principles detailed herein apply consistently across all organizational functions and data processing activities.

We are committed to ensuring full compliance with the European Union's General Data Protection Regulation (GDPR). This includes establishing and maintaining a robust data protection framework, operationalizing data management practices that safeguard personal information, and upholding the rights of data subjects.

2. Scope Statement

This policy applies to all employees, contractors, and third-party vendors who process personal data of EU residents on behalf of Excelsoft. It covers all data processing activities, regardless of where the data is stored or processed.

This policy outlines the principles and practices that govern the collection, processing, and safeguarding of personal data.

We uphold the following principles

- Lawfulness, fairness, and transparency
- Purpose limitation and data minimization
- Accuracy and accountability
- Integrity and confidentiality

3. Principles of Data Processing

Excelsoft is committed to adhering to the following core principles of GDPR in all data processing activities:



3.1 Lawfulness, Fairness, and Transparency

All personal data processing must be lawful and fair. Excelsoft will be transparent about its data processing activities and will inform data subjects about how their data is being used. This includes providing clear and concise privacy notices at the point of data collection.

3.2 Purpose Limitation

Personal data will be collected for specified, explicit, and legitimate purposes only. The data will not be further processed in a manner that is incompatible with those purposes.

3.3 Data Minimization

Excelsoft will only collect and process personal data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed, ((Article 5(1)(c)).

3.4 Accuracy

All reasonable steps will be taken to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate personal data will be erased or rectified without delay. Implement regular data validation and cleansing routines. Enable data subjects to request rectification (Article 16)

3.5 Storage Limitation

Personal data will be stored for no longer than is necessary for the purposes for which it was collected unless a longer retention period is required by law or for directly related legitimate business purposes. A data retention schedule will be maintained to specify the retention periods for different categories of data. Once the purpose has been fulfilled, the data will be securely and permanently deleted or anonymized

3.6 Integrity and Confidentiality (Security)

Excelsoft will implement appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage. These measures include, but are



not limited to, access controls, encryption, pseudonymization, and regular security audits.

3.7 Accountability

Excelsoft is responsible for and must be able to demonstrate compliance with the data protection principles. This includes maintaining a record of all data processing activities and conducting Data Protection Impact Assessments (DPIAs) when necessary.

4. Data Subject Rights

The Excelsoft will have clear procedures in place to handle and respond to all requests from data subjects exercising their rights under the GDPR. These rights include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure ("right to be forgotten")
- The right to restrict processing
- The right to data portability
- The right to object
- Rights related to automated decision-making and profiling

5. International Data Transfers

The transfer of personal data outside the European Union (EU) or European Economic Area (EEA) will only occur if a valid legal safeguard is in place to ensure the continued protection of the data. Such safeguards include, but are not limited to, Standard Contractual Clauses (SCCs).



6. Contact Us

For any inquiries regarding our privacy practices or this privacy statement or to request it in another format, please refer to the contact information provided below.

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