



## Axeten Data Protection Compliance Statement

### Introduction

Axeten regards the lawful collection, storage and processing of personal information as essential to successful operations, and to maintain confidence between any stakeholder and ourselves. We ensure that our organisation manages personal information lawfully and with care.

Axeten recognises and accepts its responsibilities as set out in the Data Protection Act 2018 and EU Regulation 2016/679 (GDPR).

We are open to complying with any protection legislation in the jurisdiction where a stakeholder might be incorporated or reside. We take all reasonable steps to meet our responsibilities, so that we adopt and promote good practice in the handling and use of personal information.

### Scope

This statement applies to all Axeten stakeholders.

This statement applies to the personal information collected, processed and stored throughout the business, that is:-

- training services, and;
- research services, and;
- software supply, and;
- reseller supplies.



### Personal Information Collected

Axeten collects, stores and processes personal information for two purposes:-

1. administration of the business, and the supply of our services and solutions, and
2. information we collect, under instruction from our customers, so that we might perform the research service.

### Compliance

We comply with the principles of data protection, as set out in the current legal framework. To summarize, personal information shall be:-

- processed lawfully, fairly and in a transparent manner and, in particular, shall not be processed unless specific conditions are met, and;
- processed for limited, specific and lawful purposes, and shall not be further processed in any manner incompatible with those purposes, and;
- adequate, relevant and sufficient for the purpose or purposes for which it is processed, and;
- accurate and, where necessary, kept up to date, and;
- kept for no longer than is necessary for the purposes for which the personal data is processed, and;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures, and;
- only transferred to a country or territory that ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.



In light of these obligations, Axeten, through appropriate management, shall:-

- use personal information in the most efficient and effective way to deliver better services, and;
- observe fully conditions regarding the fair collection and use of information, and;
- meet its legal obligations to specify the purposes for which information is used, and;
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs to comply with any legal requirements, and;
- ensure the quality of the information used, including its accuracy and relevancy for the purpose specified, and;
- apply strict checks to determine the length of time the information is held, and;
- securely destroy data which is no longer needed, and;
- take appropriate technical and organisational security measures to safeguard personal information (including unauthorised or unlawful processing and accidental loss or damage of data), and;
- ensure that the rights of people about whom information is held can be fully exercised under applicable data protection legislation.

In addition, we take steps to ensure that:-

- there is someone with specific responsibility for data protection in the company, and;
- queries about handling personal information are promptly dealt with, and;
- everyone managing and handling personal information is appropriately supervised, and;
- methods of handling personal information are clearly described, and;
- methods of handling personal information are regularly assessed and evaluated.



### Employee Responsibilities

To comply with data protection legislation, Axeten has created and implemented policies and procedures. All employees receive guidance and training in their individual responsibilities regarding the protection of personal information. Department managers and the Compliance Officer are responsible for the day to day implementation and enforcement of the company policies and procedures. The Executive is responsible for overall compliance within the company. We make certain that:-

- the only people able to access personal data are those who need it for their duties, and;
- everyone managing and handling personal information is appropriately trained to do so, and;
- everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice, and;
- everyone managing and handling personal information keeps all data secure by taking the appropriate security precautions, and;
- Systems Administrator ensures all systems, services and equipment used for storing data meet the best security standards, and;
- Systems Administrator performs regular checks and scans to ensure security hardware and software is functioning properly.

### Disclosure

All company policies and procedures that relate to activities performed by employees are disclosed to a new employees during their induction, and to all employees at any periodic review, where the employee is obliged to review the policy, and sign off on their obligation to comply.



### Changes to this statement

The Compliance Officer is continually aware of a change in legislation that might affect this statement and any amendment is made accordingly, otherwise the policy is reviewed annually.

### References

Policies and procedures relevant to this Statement available at <https://www.axeten.com/documents>

- Training Privacy Policy
- Research Privacy Policy
- Security Policy
- Data Breach Policy
- Equality and Diversity Policy
- Anti-Bribery Policy
- Corporate and Social Responsibility Policy
- Complaints Policy and Procedure