

# Data Protection Policy

Biotoomics Ltd.

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## Definitions

<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means person responsible for data protection within Biotoomics Ltd (Chad Zhang).

### 1. Introduction

Biotoomics Ltd needs to gather and use certain information about individuals. These can include Customers, supplier, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

### 2. Data protection principles

Biotoomics Ltd is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f. 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.”

### **3. General provisions**

- a. This policy applies to all personal data processed by Biotoolumics Ltd.
- b. The Responsible Person shall take responsibility for Biotoolumics Ltd’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

### **4. Lawful purposes**

- a. All data processed by Biotoolumics Ltd must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Biotoolumics Ltd’s systems.
- d. Individuals have the right to access their personal data and any such requests made to Biotoolumics Ltd shall be dealt with in a timely manner.

### **5. Data minimisation**

- a. Biotoolumics Ltd shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### **6. Accuracy**

- a. Biotoolumics Ltd shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, Biotoolumics Ltd shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

### **8. Security**

- a. Biotoolumics Ltd shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Biotoomics Ltd shall promptly assess the risk to people's rights and freedoms and make the relevant parties aware of the breach.

**END OF POLICY**