

Neotech Global Data Protection Policy 2023

Neotech Global Services Limited, its direct and indirect subsidiaries, and its overseas branch offices collectively referred to as "Neotech," is dedicated to adhering to all applicable legal and regulatory obligations with regard to data protection and privacy in the areas in which it carries out its business operations. The minimal requirements for Neotech's collection, processing, and other uses of personal data are outlined in this privacy policy (the "Policy"). This includes any information that could be deemed sensitive personal data (the "Personal Data") about specific people, such as Neotech associates, business contacts, clients, or vendors (the "Individuals").

Where Neotech Global Services Limited controls other company entities, such other companies will be required to abide by the principles set in this Policy.

PRIVACY PRINCIPLES

Neotech will adhere to the following guidelines when handling personal data. By means of suitable contractual agreements, NEOTECH guarantees that its vendors and business partners abide by the requirements of this Policy as well as any applicable legal and regulatory compliance standards.

- **Lawfulness of Processing**

NEOTECH will collect, store, process, use, share, transfer, analyze or otherwise handle ("Process" or "Processing") Personal Data in accordance with applicable legal requirements for legitimate business or compliance purpose or if individuals have provided consent to the Processing on any relevant basis as defined by the applicable laws or regulations.

- **Limit Collection and processing**

NEOTECH will limit the Processing of Personal Data in terms of scope and duration, as is necessary for the intended purpose.

- **Transparency**

In accordance with applicable legal requirements, NEOTECH will provide information to individuals that explains the scope and purpose of Processing, and whom to contact to seek clarifications about privacy or data protection.

- **Accuracy**

As mandated by relevant laws and regulations, NEOTECH will take all appropriate steps to guarantee that the Personal Data it processes is accurate and serves the intended purpose. In the context of the reasons for which they are processed, any inaccurate personal data will be promptly removed or corrected. The data subject's obligation to notify and/or use the options described in privacy notices may affect the accuracy of the data.

- **Security and Confidentiality**

NEOTECH works to safeguard the privacy and security of people's personal information by putting in place organizational, technical, and physical safeguards against unintentional, illegal, or unlawful loss, alteration, disclosure, or access. NEOTECH shall guarantee that the precautions taken are suitable for the risks associated with the Processing it performs and the type of Personal Data in question.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties

- **Privacy by Design**

NEOTECH incorporates the principles of Privacy by Design into all of its personal data processes executed using digital systems, technologies or manually. By default, privacy requirements are embedded into every standard, protocol and process followed by NEOTECH.

- **Disclosure**

NEOTECH discloses, when required/asked, personal data to third parties only for the purposes identified in the privacy notice, with the consent of the individual, or as required for lawful purposes. Third parties refer to public authorities, Law Enforcement Agencies and similar authorities.

DATA SUBJECT RIGHTS

NEOTECH will provide people the chance to exercise their rights as data subjects within the framework of their interaction with NEOTECH, in compliance with any applicable legal requirements. These rights might include the ability to object to the processing of their personal data, to request access to their personal data, and to correct incomplete or inaccurate personal data. Every data subject request is verified and followed through to completion. Other rights, such as the right to data portability, the right to be forgotten, and the right to withdraw consent, may be available depending on the relevant laws and the data subject's interaction with NEOTECH. NEOTECH is committed to upholding compliance and implementing all necessary measures to facilitate the exercise of granted rights by data subjects.

- **INTERNATIONAL DATA TRANSFERS**

NEOTECH operates on a global level and from time to time it may be required to transfer Personal Data across countries. NEOTECH recognizes that Personal Data needs to be treated with care, including data transfer to countries, which may not have adequate data protection laws. If NEOTECH transfers Personal Data to such countries, it will protect these Personal Data as set out in this Policy and in accordance with the requirements of applicable law.

- **DATA RETENTION**

NEOTECH will observe retention policies and procedures so that it deletes Personal Data after a reasonable time and the purposes are met. Exception applies if in the context of those purposes, it is necessary to keep the Personal Data indefinitely, or a law requires the Personal Data to be kept for a certain time. When NEOTECH no longer needs to keep Personal Data for the purposes, for which they are held, it will delete them as soon as practicable.

- **JURISDICTION-SPECIFIC REQUIREMENTS AND IMPLEMENTATION**

NEOTECH may be subject to extra regulations regarding the processing of personal data in accordance with national privacy and data protection laws. When necessary, NEOTECH will create policies and procedures to support the tenets of this policy and will interact with the appropriate regulatory or supervisory body.

- **PRIVACY ORGANIZATION AND CONTACT**

NEOTECH has set up a global Privacy Function, which is headed by the Head - Global Privacy Office of NEOTECH, and which is tasked with overseeing and implementing privacy and applicable data protection requirements. Specific data protection or privacy functions and roles may be added for individual countries or geographies. NEOTECH also appoints Data Protection Officers (or comparable function), where required by applicable laws. The privacy function is also responsible for deploying training and awareness programs and supporting the implementation of privacy principles into NEOTECH business operations and processes.

- **DATA BREACH REPORTING**

As soon as a known or suspected incident involving personal data is discovered, it must be reported. This covers incidents that NEOTECH receives notification about from its clients, associates, outside service providers, and other business partners. NEOTECH shall acquaint its personnel with the protocols for disclosing any incident, whether verified or not. Every incident is looked into, followed up on, and resolved.

- **IMPLEMENTATION**

NEOTECH has implemented internal protocols to guarantee adherence to this policy, facilitate the lawful exercise of individuals' rights as outlined in this policy and by applicable legislation, and address grievances raised by individuals regarding potential noncompliance by NEOTECH with the policy, applicable law, or both. Every person can take advantage of these agreements and/or utilize their rights by getting in touch with their local DPO.

- **CHANGES TO THE POLICY**

NEOTECH may update this Policy from time to time and without prior notice to individuals to reflect changes in law or privacy practices. If you have questions about this Policy, please contact info@neotechusa.com