



Data Protection & Privacy Policy

[R W Promotions Private Limited]

Last updated	25 th Aug 2019
--------------	---------------------------

1. Data protection principles

RW Promotions is committed to processing data in accordance with its responsibilities under this Data Privacy & Protection Policy.

R W Promotions considers it quintessential that data is -

- a. Processed fairly and in a transparent manner with regards to all concerned users.
- b. Collected for specific, genuine and legitimate purposes and not further processed in a manner that is incompatible with those 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 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.

2. General provisions

- a. This policy applies to all personal data processed by RW Promotions.
- b. The responsible Person shall take responsibility for RW Promotions's ongoing compliance with this policy.
- c. This policy shall be reviewed annually by the designated authority at RW Promotions.

3. Lawful purposes

- a. All data processed by RW Promotions must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate purposes only.



- b. 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 RW Promotions's systems.

5. Data minimisation

- a. RW Promotions 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. RW Promotions 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, RW Promotions 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. RW Promotions 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, RW Promotions shall promptly assess the risk and shall take necessary measures to minimize the impact of breach and sensitize concerned individuals.

END OF POLICY