

SIITS

Data Processing Agreement



SIITS Legal Team

1st April, 2023

PRINCIPLES OF DATA PROTECTION

Article 5 of the General Data Protection Regulation (GDPR) sets out key principles which lie at the heart of the general data protection regime. These key principles are set out right at the beginning of the GDPR and they both directly and indirectly influence the other rules and obligations found throughout the legislation. Therefore, compliance with these fundamental principles of data protection is the first step for SIITS in ensuring that we fulfill our obligations under the GDPR. The following is a brief overview of the Principles of Data Protection found in article 5 GDPR followed by SIITS.

LAWFULNESS, FAIRNESS AND TRANSPARENCY

SIITS maintains that any processing of personal data should be lawful and fair. SIITS also maintains that it should be transparent to individuals that personal data concerning them are collected, used, consulted, or otherwise processed and to what extent the personal data are or will be processed. SIITS also maintains that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.

PURPOSE LIMITATION

SIITS only collects personal data for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. In particular, the specific purposes for which personal data are processed should be explicit and legitimate and determined at the time of the collection of the personal data. However, further processing for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes (in accordance with Article 89(1) GDPR) is not considered to be incompatible with the initial purposes.

DATA MINIMISATION

SIITS maintains that processing of personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. Personal data should be processed only if the purpose of the processing could not reasonably be fulfilled by other means. This requires, in particular, ensuring that the period for which the personal data are stored is limited to a strict minimum (see also the principle of 'Storage Limitation' below).

ACCURACY

SIITS ensures that personal data are accurate and, where necessary, kept up to date; taking every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. In particular, SIITS accurately records the information it collects or receives and the source of that information.

STORAGE LIMITATION

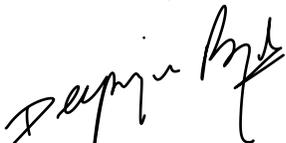
SIITS maintains that personal data should only be kept in a form which permits identification of data subjects for as long as is necessary for the purposes for which the personal data are processed. In order to ensure that the personal data are not kept longer than necessary, time limits are established by the SIITS for erasure or for a periodic review. SIITS is committed to review all such personal data by the end of every financial year and dispose off the data which are not required.

INTEGRITY AND CONFIDENTIALITY

SIITS also maintains that personal data should be processed in a manner that ensures appropriate security and confidentiality of the personal data, including protection against unauthorized or unlawful access to or use of personal data and the equipment used for the processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

ACCOUNTABILITY

Finally, SIITS is responsible for, and demonstrates, its compliance with all of the above-named Principles of Data Protection. SIITS also take responsibility for its processing of personal data and how they comply with the GDPR, and be able to demonstrate (through appropriate records and measures) their compliance, in particular to the DPC.


Deep Ranjan

CEO - SIITS

