

# DATA PRIVACY POLICY

ELYSIUMSECURITY LTD

**VERSION :** v1.2  
**DATE :** 12/12/2019  
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**REFERENCE :** ES-P-DPP191212  
**CLASSIFICATION :** **PUBLIC-RESTRICTED**



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## 1 INTRODUCTION

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**ELYSIUMSECURITY LTD** (hereinafter “the company” or “the organisation” or “we” or “us” or “ES”) is taking cyber security very seriously. ES is concerned about privacy issues and wants you to know how we are collecting, using, processing, disclosing and protecting your information in accordance with applicable law and the Data Protection Act 2017 in Mauritius.

## 2 VALIDITY AND DOCUMENT MANAGEMENT

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This document is valid from 01/01/2018 and must be reviewed once a year, or where an incident or changes in nature of risks warrant an exceptional review. ES has the right at any time to update or modify this Policy.

## 3 PURPOSE

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This document defines how retention, storage and disposal of personal data is controlled ES. This applies to all personal data held by us, from creation to destruction, regardless of the manner, form or media by which it was acquired or within it is retained.

We comply with our obligations under data protection laws (including the GDPR and the Data Protection Act 2017) whenever we process Personal Data relating to our employees, clients and any other data subjects we interact with.

## 4 SCOPE

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You agree to the collection and use of information in connection with this policy if you are a data subject who chooses to use our service, is an employee, is in correspondence with us, or otherwise involved in the activities of the Company. Where you do not consent to the collection and use your information in certain circumstances, we may not be able to provide you certain services or react to a problem you raised.

You may not be asked for consent where the company has a lawful basis for processing personal data we already have, or acquire through performance of a contract, in compliance with a legal requirements, protection of your vital interests as a data subject, performance of a task carried out in the public interest, processing is necessary for other legitimate interests of us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

## 5 PERSONAL DATA WE COLLECT

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Personal data means any information relating to a data subject, as such term is defined under the Data Protection Act 2017. Personal data includes, but is not restricted to:

- Personal contact details (name, address, contact number, country ID number and email address)
- Employment information such as social security, passport or visa number or the identification of information required to confirm eligibility for employment by a government entity.
- Curriculum Vitae
- Signature
- Citizenship

## 6 USE OF PERSONAL DATA

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To the extent permitted by law, we may use your information for purposes of operating our business and other legitimate purposes. We may use your personal information in the following ways:

- Performance of a contract
- Recruiting and employment
- To deliver services to you
- To reply to your requests
- data analysis

The purpose and retention conditions for which we collect the personal data will be stated in any consent form you are asked to accept or implied in any participation in a lawful basis for collection. Where we collect or use personal information other than as set out in this policy, we will ensure that we do so in accordance with applicable law and the Data Protection Act 2017.

## 7 DISCLOSURE OF PERSONAL DATA

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We may disclose your Personal Information to the extent permitted by applicable law or with your consent:

- when it is required by law
- to comply with law (Judicial proceedings, court order, law enforcement, exercise our legal rights, defend against legal claim, request from public and governmental authorities)
- when there is an investigation or in prevention, against illegal activities
- when there is a suspected fraud
- when there is a potential threat to a safety of any person
- for the purposes set out in this Privacy Policy
- to our third-party service providers to provide service on our behalf, facilitate our service or perform related services

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## 8 THIRD-PARTY

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The privacy practices and data protection policies of third parties are not covered by this Policy and cannot be controlled. Please read and refer to the third party's privacy policy when you submit personal information to such a third party. In circumstances, we disclose your personal data to third parties for the purposes described in this policy, they are bound by contractual obligation not to disclose or use the information for any other purpose.

If you choose to provide personal information of a third party (such as name, email and telephone number) to **ELYSIUMSECURITY LTD**, you represent and warrant that you have permission from the third party to do so (e.g. Job referrals). However, we do not accept any personal data of third party without the proof of consent.

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## 9 YOUR RIGHTS

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**ELYSIUMSECURITY LTD** is committed to comply with regulations with respect to your rights. It is your responsibility as a data subject to assure that your information we collect is kept up to date and is accurate. The company takes all reasonable step to discard or update any inaccurate data without delay.

You have certain rights in respect to how we use your personal data. These are:

- to request a copy of the personal information we have about you as far as practical; unreasonable request, or information that is difficult or time consuming to retrieve, may be subjected to charges.
- to ensure that your personal data that we have is up-to-date, accurate and complete. However, it is your responsibility to submit correct and updated data to **ELYSIUMSECURITY LTD** and our responsibility is to update the data provided by you.
- to have your personal data erased if the personal data collected, for the purposes for which it was collected, are no longer necessary, unless we are required by law to retain it.
- to withdraw your consent whenever **ELYSIUMSECURITY LTD** processes your personal data based on your consent, subject to applicable laws.
- to object to the processing of your personal data and if you think that your data protection rights are being breached you have the right to contact the applicable supervisory authority to register a compliant.

Please contact us at [dataprivacy@elysiumsecurity.com](mailto:dataprivacy@elysiumsecurity.com) if you wish to exercise any of the above rights.

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## 10 PROTECTING YOUR PERSONAL DATA

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The security of your personal data is important for us. We use appropriate methods to protect your personal data. **ELYSIUMSECURITY LTD** is compliant with the basic privacy and security principles such as access control to different categories of personal data and lockable document storage cabinets. Wherever practical, we ensure that data is encrypted during transit and storage and that access to this data is strictly limited to a minimum number of individuals and subject to confidentiality obligations.

We also train our employees on privacy and security protection to raise awareness of personal data protection and to ensure the security of your personal data. Our personnel having access to your personal data are bound by a non-disclosure agreement with the company.

The company only retains your personal data for a reasonable period and until the purpose for which the data was collected is achieved, including for the purposes of satisfying any legal, accounting, or reporting requirements. It is our policy to destroy personal information once we are no longer required to retain it by law or business.

In certain circumstances, we may anonymize your personal data (so that it is no longer associated with you) for research or statistical purposes.

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## 11 TRANSFER OF INFORMATION OUTSIDE MAURITIUS

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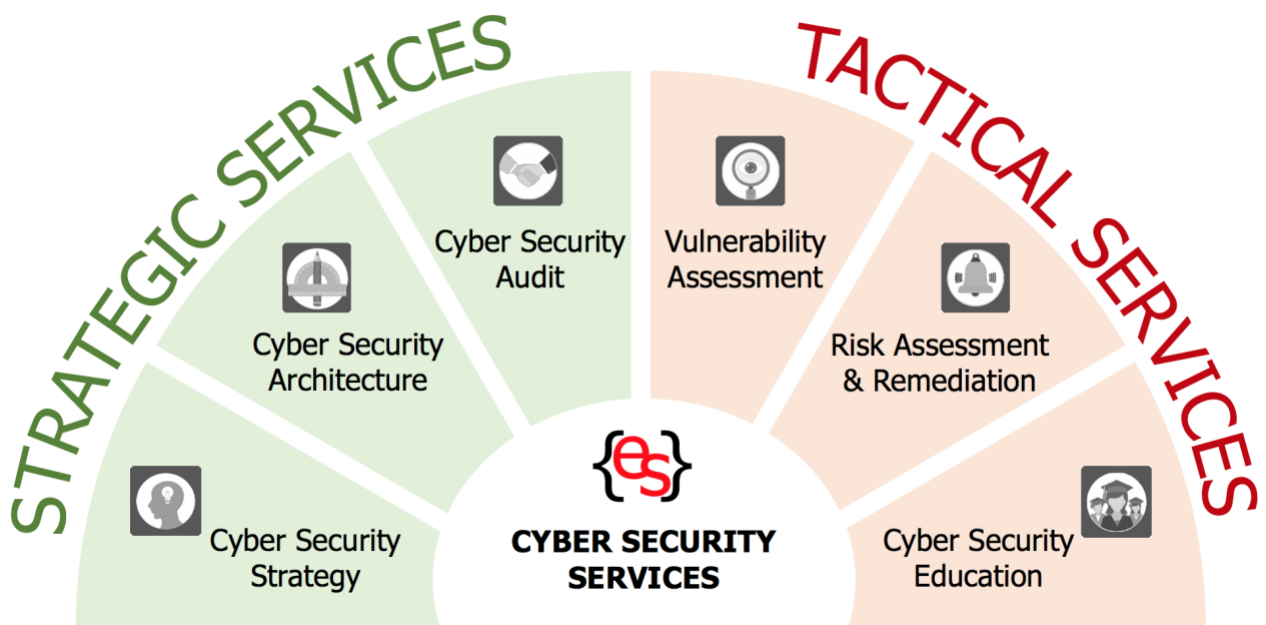
Your personal data we collect may be processed or accessed outside Mauritius where **ELYSIUMSECURITY LTD** or its affiliates, service providers or business partners are situated. In this case, we take appropriate safeguards to ensure that the personal data is treated securely in accordance with this policy and applicable laws. We use encryption where appropriate. The company uses a wide range of legal procedures, such as standard contractual clauses with those parties to ensure data is processed in a secure manner.

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## 12 CONTACT US

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If there are any questions regarding this Privacy Policy or if you have any complaints or concerns about privacy do not hesitate to contact our Data Protection Officer (DPO) at [dataprivacy@elysiumsecurity.com](mailto:dataprivacy@elysiumsecurity.com) .



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