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## SANITAP DATA PROTECTION POLICY

SaniTap is committed to safeguarding the privacy and protecting the personal data of individuals in accordance with applicable data protection laws. This Data Protection Policy outlines our commitment to ensuring the lawful and responsible handling of personal data and establishes guidelines for its protection.

### Scope

This policy applies to all personal data collected, processed, stored, or shared by SaniTap, including data of employees, customers, contractors, suppliers, and any other individuals whose data we handle.

### Principles of Data Protection

We adhere to the following principles when processing personal data:-

**Lawfulness and Transparency:** We process personal data lawfully and transparently, ensuring individuals are aware of the purposes for which their data is collected and how it will be used.

**Purpose Limitation:** We collect and process personal data only for specific and legitimate purposes, ensuring it is not used for any incompatible purposes.

**Data Minimization:** We only collect and retain personal data that is necessary and relevant for the intended purpose, ensuring its accuracy and completeness.

**Storage Limitation:** We retain personal data for only as long as required to fulfill the purposes for which it was collected, taking into account legal, contractual, and operational obligations.

**Data Security:** We implement appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction, ensuring its confidentiality and integrity.

**Individual Rights:** We respect the rights of individuals regarding their personal data, including the right to access, rectify, erase, restrict processing, object to processing, and data portability. We provide mechanisms for individuals to exercise these rights.

**Accountability:** We maintain records of our data processing activities, conduct privacy impact assessments when required, and ensure compliance with data protection laws through appropriate policies, procedures, and training.  
Data Collection, Processing, and Sharing

**Lawful Basis for Processing:** We ensure that personal data is processed based on a lawful basis, such as the necessity of processing for the performance of a

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contract, compliance with legal obligations, consent, or legitimate interests pursued by SaniTap or a third party.

**Consent:** Where required, we obtain explicit and informed consent from individuals before processing their personal data, and individuals have the right to withdraw consent at any time.

**Data Sharing and Transfers:** When sharing or transferring personal data to third parties or outside the country, we ensure appropriate safeguards are in place to protect the data, such as contractual agreements or reliance on recognized legal mechanisms.

**Data Processors:** If we engage third-party processors to handle personal data on our behalf, we ensure they provide sufficient guarantees of data protection and comply with our data protection standards through contractual agreements.

## Data Protection Policy

### International Data Transfers

We ensure that any transfer of personal data outside the country of origin complies with applicable legal requirements. This includes employing appropriate mechanisms, such as standard contractual clauses or relying on adequacy decisions, to establish a lawful basis for international data transfers.

When transferring personal data outside the United Kingdom, we ensure compliance with relevant international data protection laws, such as the GDPR's provisions on international data transfers. We employ appropriate mechanisms to ensure the lawful transfer of personal data, such as the use of standard contractual clauses or relying on the Privacy Shield framework where applicable.

If we transfer personal data from the European Economic Area (EEA) to the United States or other participating countries, we adhere to the EU-U.S. Privacy Shield or Swiss-U.S. Privacy Shield frameworks, as applicable. These frameworks provide a legal mechanism for the transfer of personal data in compliance with EU data protection requirements.

### Consent and Privacy Rights

We respect individuals' rights regarding their personal data and obtain explicit and informed consent when required. We provide individuals with clear information about the purposes of data processing and their rights to access, rectify, erase, restrict processing, object to processing, and data portability. We have established processes to promptly address and fulfill individuals' requests related to their personal data by contacting the SaniTap Data Protection Officer (DPO) below.

### Data Security and Confidentiality

We implement comprehensive technical and organizational measures to ensure the security and confidentiality of personal data. These measures include access controls,

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encryption, regular system audits and strict confidentiality obligations for all personnel who handle personal data.

Other measures may include the use of Data Processing Agreements when engaging with third-party service providers or partners outside our jurisdiction, we will establish data processing agreements that include contractual provisions to safeguard personal data and ensure compliance with international data protection laws.

### On-line Privacy

The online Privacy Policy used on the SaniTap.org website [www.sanitap.org/privacy](http://www.sanitap.org/privacy) is an integral part of SaniTap's overall Data Protection Policy. It serves as a specific document that outlines how SaniTap collects, uses, discloses, and protects personal data obtained through the website.

The Privacy Policy provides clear and transparent information to individuals visiting the website about the types of personal data collected, the purposes for which it is collected, and how it is processed. It also describes the legal basis for processing personal data, the rights individuals have over their data, and the measures in place to ensure data security.

By aligning with the principles and requirements stated in the Data Protection Policy, the Privacy Policy ensures consistency and compliance in how SaniTap handles personal data across all channels, including the website. It ensures that individuals are informed about the data practices and privacy measures implemented by SaniTap, allowing them to make informed decisions about sharing their personal information.

The Privacy Policy serves as a public-facing document that demonstrates SaniTap's commitment to protecting individuals' privacy and complying with applicable data protection laws, including the General Data Protection Regulation (GDPR) in the UK. It provides transparency and builds trust with website visitors, assuring them that their personal data is handled responsibly and in accordance with the established data protection framework.

By integrating the online Privacy Policy into the broader Data Protection Policy, SaniTap creates a cohesive and comprehensive approach to data protection that covers all aspects of its operations, including online activities and the handling of personal data obtained through the website.

### Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing our data protection practices and ensuring compliance with data protection laws and regulations. The DPO serves as a point of contact for individuals to raise concerns, ask questions, and exercise their data protection rights. See contact details below.

### Data Breach Management

In the event of a personal data breach, we have procedures in place to promptly assess and mitigate the risks associated with the breach. We notify the relevant authorities and affected individuals as required by law and take necessary steps to prevent future breaches.

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## Policy Review

We regularly review and update this Data Protection Policy to ensure its continued relevance and compliance with applicable data protection laws and regulations.

## Compliance with Data Protection Laws

As a legal entity based in the United Kingdom, we comply with the provisions of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) as applicable in the United Kingdom. We are dedicated to upholding the principles and obligations outlined in these laws, including the lawful and fair processing of personal data, data minimization, data accuracy, storage limitation, security safeguards, and individual rights.

We recognize that different countries may have their own data protection regulations, and we strive to ensure that our data handling practices align with these laws to protect the privacy and rights of individuals worldwide. Here's how SaniTap ensures compliance with international data protection laws:

## Registration with Information Commissioner's Office (ICO)

SaniTap is registered with the UK Information Commissioner's Office (ICO) [Information Commissioner's Office \(ICO\)](#) as a data controller.

SaniTap's ICO registration number is **C1338402**. Our registration demonstrates our commitment to complying with the data protection laws and regulations in the United Kingdom. We take the protection of personal data seriously and strive to ensure that all data processing activities are carried out in accordance with the applicable legal requirements. By registering with the ICO, we affirm our dedication to transparency, accountability, and responsible handling of personal information.

## Contact

### Data Protection Officer Contact Information

For any questions or concerns regarding the handling of personal data or to exercise your data protection rights, please contact our Data Protection Officer at [dpo@sanitap.org](mailto:dpo@sanitap.org)

Individual can exercise their rights to access, rectify, erase, restrict processing, object to processing, and data portability by contacting the DPO directly with the subject line 'data access'.

### Reporting of Violations of Data Protection Policy

Reporting of any suspicions of violations of our Data Protection Policy can be reported, in confidence, to the SaniTap Grievance Officer and sent via email to [confidential\\_grievance@sanitap.org](mailto:confidential_grievance@sanitap.org) with the subject line 'Suspected violations of Data Protection Policy'.