Example Corp

Data Privacy Policy

Field	Information
Version Number	1.0
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Review Date	2025-07-26
Document Owner	[Chief Information Officer, e.g., John Doe]
Approved By	[Chief Executive Officer, e.g., Jane Smith]
Document Reference Number	DPP-001
Associated Documents	Information Security Policy, Acceptable Use Policy, Incident Response Policy
Revision History	1.0 - Initial Document
Audience	All Employees, Contractors, Third-Party Partners

1 - Purpose

The purpose of this Data Privacy Policy is to establish a framework for managing and protecting the personal data of our customers, employees, and other stakeholders at Example Corp. We are committed to handling personal data with care, ensuring its confidentiality, integrity, and availability, and to complying with all applicable data protection laws and regulations in the United States. This policy aims to build trust with our users and maintain a responsible approach to data handling.

2 - Scope

2.1. Departments

This policy applies to all departments within Example Corp, including Engineering, Customer

Support, Sales, Marketing, Human Resources, and Finance.

2.2. Types of Data

This policy covers all types of personal data handled by Example Corp, including but not limited to customer data (names, email addresses, contact information, usage data), employee information (names, addresses, social security numbers, performance data), and any other personal information collected in the course of business operations.

2.3. Key Information Assets

This policy applies to all key information assets that hold personal data, including the Customer Database, Employee Records System, CRM System, HR Systems, Cloud Storage Services, and any other system or location where personal information is stored.

3 - Data Privacy Principles

Example Corp is committed to the following data privacy principles:

- Lawfulness, Fairness, and Transparency: Processing of personal data will be done lawfully, fairly, and transparently.
- Purpose Limitation: Personal data will only be collected for specified, explicit, and legitimate purposes.
- Data Minimization: We will only collect the personal data necessary for the specified purpose.
- Accuracy: Personal data will be kept accurate and up to date.
- Storage Limitation: Personal data will be kept only as long as necessary for the stated purpose.
- Integrity and Confidentiality: Personal data will be processed in a manner that ensures its security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.
- Accountability: Example Corp will be accountable for demonstrating compliance with these

principles.

4 - Data Classification

Example Corp classifies data based on its sensitivity and the need for protection. Personal data is classified as:

- Public: Information intended for public disclosure (rare for personal data).
- Internal: Information not intended for public disclosure but accessible within the company.
- Confidential: Sensitive information requiring restricted access, such as Customer PII, Employee Records.
- Restricted: Highly sensitive information with the strictest access controls, including Social Security Numbers.

Each data class is subject to specific handling, storage, and transmission requirements to ensure its protection.

5 - Roles and Responsibilities

The Chief Information Officer (CIO), John Doe, is responsible for overseeing the development, implementation, and maintenance of the Data Privacy Policy at Example Corp. The CIO ensures compliance with all relevant data protection laws and regulations.

The Human Resources Department is responsible for the management and protection of employee personal data, adhering to HR policies and relevant data protection laws.

The Engineering department is responsible for implementing data protection measures in software and systems, ensuring they align with data privacy principles.

Customer Support teams must protect customer data during all interactions, and adhere to Example Corp's privacy protocols.

Sales & Marketing must comply with data privacy regulations and ensure all customer data is used ethically and legally.

All employees are responsible for adhering to this Data Privacy Policy and reporting any suspected data breaches or privacy violations to the CIO.

6 - Data Handling Requirements

All personal data must be handled in a secure and confidential manner.

Data should only be accessed by authorized personnel on a need-to-know basis.

Personal data must be processed in a manner that is consistent with the purpose for which it was collected.

Data should be accurate and up to date.

Personal data must be protected against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Data transfers, especially outside the organization, must be conducted securely, with proper encryption.

When disposing of personal data, it must be done securely in accordance with our data retention and disposal policy.

7 - Data Retention Periods

Personal data will be retained only for as long as it is necessary for the purpose for which it was collected and in compliance with regulatory requirements.

Retention periods will be defined for each type of personal data and regularly reviewed.

Once the retention period has expired, personal data will be securely deleted or anonymized, unless legal obligations require otherwise.

8 - Data Disposal Procedures

Data disposal procedures must ensure the complete and irreversible destruction of personal data to prevent unauthorized access and exposure.

Physical documents containing personal data must be shredded.

Electronic data must be securely deleted using data wiping tools, and hard drives should be physically destroyed when no longer in use.

Disposal activities must be documented and performed by authorized personnel, ensuring a complete audit trail.

9 - Privacy Requirements

Example Corp is committed to respecting the privacy rights of individuals.

Individuals have the right to access their personal data, correct inaccurate data, and request deletion of data.

Individuals also have the right to object to data processing, restrict processing, and data portability, as provided by applicable laws.

Example Corp will respond to data subject requests within the timeframe set by applicable laws and regulations.

Individuals must be informed about the purpose of data collection, how data will be used, and who data will be shared with.

Privacy notices must be provided in a clear and accessible format.

10 - Cross-Border Data Transfers

Cross-border data transfers of personal data will only be made to countries with an adequate level of data protection or when appropriate safeguards are in place, including Standard Contractual Clauses (SCCs).

Data protection assessments will be conducted before any cross-border transfer of data to ensure compliance with applicable laws.

11 - Data Security Measures

Example Corp implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or disclosure. These measures include:

- Access control to systems and data.
- Encryption of data at rest and in transit.
- Regular security assessments and testing.
- Employee awareness training.
- Monitoring of security incidents.
- Incident response plans to address data breaches.

12 - Compliance Requirements

Example Corp is committed to complying with all applicable data protection laws and regulations in the United States, including relevant state laws.

Regular audits and assessments will be conducted to ensure ongoing compliance.

Example Corp will work with regulatory authorities to ensure that any data privacy related matters are handled promptly and professionally.

13 - Review and Updates

This Data Privacy Policy will be reviewed at least annually, or more frequently as needed, to ensure it remains effective and compliant with any changes in legal and regulatory requirements.

The review process will be led by the Chief Information Officer (CIO), with input from relevant departments.

Updates to the policy will be communicated to all employees.

14 - Related Documents and References

This policy should be read in conjunction with the following documents:

- Information Security Policy

- Acceptable Use Policy
- Incident Response Policy

15 - Definitions

Personal Data: Any information relating to an identified or identifiable natural person.

Data Subject: The individual to whom personal data relates.

Data Controller: The entity that determines the purposes and means of the processing of personal data.

Data Processor: The entity that processes personal data on behalf of the Data Controller.

Data Breach: A security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data.

PII (Personally Identifiable Information): Information that can be used to identify a specific individual, such as names, addresses, social security numbers, email addresses.

Encryption: The process of converting data into an unreadable format to prevent unauthorized access.

Anonymization: The process of altering or removing personal data so that it cannot be associated with an individual.

Data Minimization: Only collecting and processing the minimal amount of personal data required for a specific purpose.

Data Retention: The period for which personal data is stored.

Data Subject Rights: The rights granted to individuals regarding their personal data, such as access, rectification, and erasure.