

GDPR Data Protection Policy

Version 1.0 — Effective **25 June 2025**

E.M.E International SARL

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1. Purpose and Scope (Recital 39, Art. 5)

This Policy establishes the principles, organisational measures, and procedures by which E.M.E International SARL ensures that all personal data are processed lawfully, fairly, transparently, and in accordance with GDPR.

2. Roles and Responsibilities (Art. 4(7), Art. 37)

2.1 Controller

E.M.E International SARL acts as **Data Controller**. Ultimate responsibility lies with the Board of Directors.

2.2 Data Protection Officer (DPO)

Pursuant to Art. 37. Duties include monitoring compliance, training, and cooperation with authorities.

2.3 Processors and Sub-Processors

All third parties processing data on our behalf sign a Data Processing Agreement (Art. 28). A live register is maintained (Appendix A).

3. Lawfulness of Processing (Art. 6)

Processing activities rely on one or more of the following bases:

- **Contract** — Art. 6(1)(b): ecommerce orders, travel bookings, SaaS log-in.
- **Legal obligation** — Art. 6(1)(c): AML/KYC, bookkeeping, taxation.
- **Legitimate interests** — Art. 6(1)(f): network security, ESG metric aggregation; interests are balanced via documented LIA.
- **Consent** — Art. 6(1)(a): direct email marketing to prospects; captured via double opt-in.

Special-category data (Art. 9) are processed only where strictly necessary (e.g. dietary restrictions for tours) under explicit consent (Art. 9(2)(a)).

4. Data Minimisation and Accuracy (Art. 5(1)(c)(d))

Data collection forms enforce required-field logic; periodic audits ensure obsolete records are corrected or erased.

5. Data Subject Transparency (Art. 12–14)

A layered Privacy Notice (see separate "GDPR Privacy Notice" document) is issued at before point of collection. Automated surrender receipts log notice acceptance.

6. Data Subject Rights Fulfilment (Art. 15–22)

The Rights Response SOP guarantees:

- Identity verification (Art. 12(6)).
- Response within one month (Art. 12(3)).
- Secure data export (JSON + password zip) for portability (Art. 20).
- Log of deletion actions (Art. 17) kept for 24 months.

7. Security of Processing (Art. 32)

Controls include: AES-256 encryption at rest, TLS 1.3 in transit, Role-Based Access Control, Multi-Factor Authentication, quarterly penetration tests, and ISO 27001-aligned incident management.

8. Data Breach Notification (Art. 33–34)

A breach register is maintained. Notification to the Belgian DPA occurs within 72 hours unless risk is unlikely. High-risk breaches trigger data-subject communication via email or in-app banner.

9. International Transfers (Art. 44–49)

Transfers outside the EEA follow:

1. **Adequacy Decisions** — Canada (commercial), Japan.
2. **SCCs 2021/914** with supplementary measures (ENISA encryption profile).
3. **Article 49 derogations** (explicit consent) for destination-tour bookings.

A Transfer Impact Assessment (TIA) template is included in Appendix B.

10. Retention and Erasure (Art. 5(1)(e))

Data Set	Retention Period	Deletion Method
Financial records	7 years	Logical purge + secure destruction logs

ESG KPI archive	10 years	Database wipe script + hash audit
SaaS user logs	12 months	Aggregation then anonymisation
Recruitment files	6 months	Shred physical, wipe digital

11. Data Protection Impact Assessment (DPIA) (Art. 35)

New high-risk processing (e.g. biometrics, large-scale tracking) triggers DPIA workflow in *OneTrust*. DPO signs off prior to go-live.

12. Training and Awareness (Art. 39(1)(b))

All employees undergo GDPR on-boarding within 30 days of hire and annual refresher e-learning. Completion rates are monitored.

13. Monitoring and Review

This Policy is reviewed at least annually or upon significant regulatory or operational change. Latest review date: _____.

14. Supervisory Authority Contact (Art. 13(2)(d))

Belgian Data Protection Authority (GBA) — Rue de la Presse 35, 1000 Brussels. Phone: +32 (0)2 274 48 00.

15. Document Control

Version	Date	Change Summary
1.0	25 June 2025	Initial release.

Appendix A — Processor Register (Art. 30(2))

Insert live table of all processors with processing purpose, location, SCC status.

Appendix B — Transfer Impact Assessment Template

Insert template aligned with EDPS EDPB guidelines.