

# DATA PROCESSING AND PRIVACY POLICY

Effective Date: June 1, 2025

Last Updated: May 15, 2025

## 1. Introduction

This Data Processing and Privacy Policy ("Policy") outlines how TechCorp Solutions Inc. ("TechCorp," "we," "our," or "us") collects, uses, processes, and protects personal data in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

This Policy applies to all data processing activities conducted by TechCorp, including data processed through our websites, applications, services, and products.

## 2. GDPR Compliance Statement

As a data processor and controller, TechCorp is committed to ensuring full compliance with the GDPR. We have implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk of processing personal data.

Under the GDPR, we recognize and respect the rights of data subjects, including:

- The right to access personal data
- The right to rectification
- The right to erasure ("right to be forgotten")
- The right to restrict processing
- The right to data portability
- The right to object to processing

## 3. FDA Regulated Data

Where applicable, TechCorp follows all FDA guidelines and regulations for handling health-related data. Our systems that process FDA-regulated information comply with 21 CFR Part 11 requirements for electronic records and electronic signatures.

Important: Any data related to FDA regulatory submissions, clinical trials, or medical devices must be handled according to our enhanced security protocols outlined in Appendix A.

## 4. HIPAA Compliance

For customers in the healthcare sector, TechCorp offers HIPAA-compliant solutions. We implement all required administrative, physical, and technical safeguards to protect the confidentiality, integrity, and availability of protected health information (PHI).

Our Business Associate Agreements (BAAs) detail our specific obligations under HIPAA when processing PHI on behalf of covered entities.

## 5. Data Processing Activities

TechCorp processes personal data for the following purposes:

- Providing our products and services

- Customer support and account management
- Marketing and communications (subject to consent where required)
- Improving and developing our products and services
- Compliance with legal obligations

## 6. International Data Transfers

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TechCorp may transfer personal data to countries outside the European Economic Area (EEA) or the data subject's country of residence. Such transfers are conducted in compliance with applicable data protection laws, using appropriate safeguards such as Standard Contractual Clauses approved by the European Commission or other lawful transfer mechanisms.

## 7. PCI DSS Compliance

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When processing payment card information, TechCorp adheres to the Payment Card Industry Data Security Standard (PCI DSS). We implement and maintain appropriate security measures to protect cardholder data and comply with all applicable PCI DSS requirements.

## 8. Data Retention

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TechCorp retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting requirements. Our specific retention periods are detailed in our Data Retention Schedule, available upon request.

## 9. SOX Compliance

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As a publicly traded company, TechCorp maintains compliance with the Sarbanes-Oxley Act (SOX). We implement appropriate internal controls over financial reporting and ensure the accuracy and integrity of our financial data and related information systems.