

Data Protection Policy

PP-DATA2



Contents

1. Introduction	3
2. Scope	3
3. Who is covered under the Data Protection Policy?	3
4. Our Commitment	3
5. Actions	4
6. Disciplinary Consequences	4

1. Introduction

Our Data Protection policy refers to our commitment to treat information and Personal Data of our employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

2. Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us, who act on Pod Point's behalf and with whom Pod Point shares Personal Data.

3. Who is covered under the Data Protection Policy?

This policy applies to all employees of Pod Point and its subsidiaries. The policy also applies to all contractors, consultants, partners and any other external entity working with or on behalf of Pod Point.

As a general rule, this policy applies to anyone Pod Point collaborates with or who acts on Pod Point's behalf and who may need access to Pod Point's information and data.

All must comply with this policy.

4. Our Commitment

As part of our operations, Pod Point needs to obtain and process information including personal information such as names, addresses, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of the interested parties.

Once the information is made available to us, the following rules apply:

Pod Point is committed to ensuring that the data is:

- Accurate and kept up-to-date.
- Collected fairly and for lawful purposes only.
- Processed by the company within its legal and moral boundaries.

- Protected against any unauthorised or illegal access by internal or external parties.

Our data will not be:

- Communicated informally.
- Stored for longer than it is necessary.
- Transferred to organisations which have not put in place technical and organisational measures designed to protect the Personal Data and information.
- Distributed to any party other than the ones agreed upon by the data owner to the exception of legitimate requests from law enforcement and the United Kingdom (UK) data protection authorities.

Finally, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, we must without limitation:

- Let people know which of their data is collected.
- Inform people about how we will process their data.
- Inform people about who has access to their information.
- Have provisions in cases of lost, corrupted or compromised data.
- Allow people to exercise their rights towards their Personal Data such as the right to be forgotten, to be erased from our Database etc.

5. Actions

Pod Point is committed to implementing technical and organisational measures designed to protected information and Personal Data such as:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection and processing procedures.
- Implement a data protection and information security training program.
- Build secure networks to protect online data from cyberattacks.
- Implement clear procedures for reporting privacy breaches and data misuse Including having the relevant contract in place with our suppliers and third-parties with whom we share the Personal Data.
- Establish data protection practices such as document shredding, secure locks, data encryption, frequent backups of the data, authorise access to data etc..
- Publish this policy on our public facing domains.

6. Disciplinary Consequences

This policy must be strictly followed by all at all times. A breach of this policy will lead to disciplinary and possibly legal action.