

# HEALTHY MINDS, HEALTHY BODS

## DATA PROTECTION POLICY



Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

### Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, 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 interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- 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 unauthorized or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Transferred to organizations that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data

### Actions

To exercise data protection we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices



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*Lawrence Curtis: Chief Executive  
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