

Umbrella Wellness LTD.

Data Protection Policy 2023

1. Introduction

This Data Protection Policy outlines our commitment to safeguarding the privacy and security of personal data collected, processed, and managed by Umbrella Wellness LTD ("the Company"). This policy applies to all staff members who handle personal data in the course of their duties.

2. Scope

This policy covers all personal data, regardless of its format, that is processed by Umbrella Wellness LTD in connection with its operations. This includes data related to clients, employees, contractors, and any other individuals associated with the Company.

3. Principles

Umbrella Wellness LTD is committed to upholding the following data protection principles:

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimisation:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.

4. Responsibilities

- All staff members are responsible for complying with this Data Protection Policy and relevant data protection laws and regulations.
- Data Controllers and Processors shall ensure that data processing activities are conducted in accordance with this policy.
- The Data Protection Officer is responsible for monitoring the Company's data protection compliance.

5. Data Collection and Use

- Personal data will only be collected for specified purposes and will be used solely for those purposes.
- Data subjects will be informed of the purposes for which their data is collected and processed.

6. Data Security

- Appropriate technical and organisational measures will be implemented to protect personal data from unauthorised access, disclosure, alteration, and destruction.
- Staff members shall handle personal data with care and ensure its confidentiality.

7. Data Subject Rights

- Data subjects have the right to access, rectify, erase, restrict processing, and portability of their personal data. Requests should be directed to the Data Protection Officer.
- Umbrella Wellness LTD will respond to data subject requests in accordance with applicable laws and regulations.

8. Data Breach Management

- Data breaches will be promptly reported to the Data Protection Officer.
- Appropriate measures will be taken to mitigate the impact of data breaches and to prevent future occurrences.

9. Data Transfers

- Personal data transfers to third parties, including subcontractors and international entities, will be conducted in compliance with relevant data protection laws.

10. Training and Awareness

- Staff members will receive training on data protection principles and their responsibilities under this policy.

11. Review and Update

- This Data Protection Policy will be reviewed periodically and updated as necessary to ensure ongoing compliance with data protection laws and best practices.
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