



# TCR GROUP

## DATA PROTECTION POLICY

*May 2018*



# ABOUT THIS POLICY

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The types of information that we may be required to handle include details of current, past and prospective employees, suppliers, customers, consultants and others that we communicate with. The information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the General Data Protection Regulation (GDPR) entering into force on May 25, 2018.

The Regulation imposes restrictions on how we may use that information.

This policy sets out our rules on data protection and the legal conditions that must be satisfied in relation to obtaining, handling, processing, storage, transportation and destruction of personal information.

Any questions or concerns about the operation of this policy should be referred in the first instance to the General Counsel / Company Secretary.



## DEFINITIONS

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**Data subjects** for the purpose of this policy include all individuals about whom TCR holds personal data. All data subjects have legal rights in relation to their personal data.

**Personal data** means data relating to an individual who can be identified from that data (or from that data and other information in TCR's possession). Personal data can be factual (such as a name, address or date of birth) or it can be subjective (such as a performance appraisal).

**Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Regulation. TCR and its affiliates are the data controllers of all personal data used in their business.

**Data users** include employees whose work involves using personal data. Data users have a duty to protect the information they handle by following our data protection and security policies at all times.

**Data processors** include any person who processes personal data on behalf of a data controller.

**Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it.



# DATA PROTECTION PRINCIPLES

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TCR will adhere to the following principles when processing Personal Data:

## ***1. Lawfulness, fairness and transparency***

TCR will process Personal Data in a lawful, fair and transparent manner. In addition, whenever we collect Personal Data, we will provide Data Subjects with more information on how we intend to use such Personal Data, including details on the Controller, the Purposes of the processing, with whom we can share Personal Data, any envisaged transfer of Personal Data outside the EEA and further information necessary to ensure a fair and transparent processing.

## ***2. Purpose limitation***

TCR will process Personal Data only for the Purposes defined at the time of collection of the Personal Data. This means that personal data will not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject will be informed of the new purpose before any processing occurs.





### ***3. Data minimisation***

TCR will only process Personal Data that are adequate and relevant for the Purposes for which TCR processes the Personal Data. Any processing of Personal Data will be limited to what is necessary in order to achieve the Purposes for which such Personal Data are being processed.

Where the Purpose allows and where the expense involved is in proportion with the goal being pursued, TCR will use anonymised or pseudonymised Personal Data. We will not collect Personal Data in advance and store such Personal Data for potential future Purposes, unless required or permitted by Data Protection Legislation.

### ***4. Accuracy***

TCR is committed to ensure that Personal Data are correct, complete, and – if necessary – are kept up-to-date. TCR will take suitable steps to ensure that inaccurate or incomplete Personal Data are deleted, corrected, supplemented or updated. If a Data Subject believes Personal Data processed by TCR are incorrect, incomplete or no longer up-to-date, Data Subjects can contact us to have such Personal Data corrected and/or completed.

### ***5. Storage limitation***

TCR will not keep Personal Data longer than is necessary for the Purposes for which TCR processes Personal Data that is no longer needed after the expiration of legal or business process related periods will be deleted. There may be an indication of interest that merit protection in individual cases. If so, TCR will keep the Personal Data on file until the interests that merit protection have been clarified legally.

### ***6. Integrity and confidentiality***

TCR will process Personal Data in a manner that ensures appropriate security of Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

***Marc Delvaux, CEO***