



GDPR Data Protection Policy

1. Introduction

GHC (UK) Ltd. is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of GHC (UK) Ltd. Employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to a GHC (UK) Ltd. Contact (i.e. the Data Subject).

Personal Data is any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person. Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data. An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. GHC (UK) Ltd., as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose GHC (UK) Ltd. to complaints, regulatory action, fines and/or reputational damage.

GHC (UK) Ltd.'s leadership is fully committed to ensuring continued and effective implementation of this policy and expects all GHC (UK) Ltd. Employees and Third Parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.
This policy has been approved by GHC (UK) Ltd.'s CEO, Zulfigar Khan

2. Scope

This policy applies to all GHC (UK) Ltd. Entities where a Data Subject's Personal Data is processed:
In the context of the business activities of the GHC (UK) Ltd. Entity.

For the provision or offer of goods or services to individuals (including those provided or offered free-of-charge) by a GHC (UK) Ltd. Entity. To actively monitor the behaviour of individuals. Monitoring the behaviour of individuals includes using data processing techniques such as persistent web browser cookies or dynamic IP address tracking to profile an individual with a view to: Taking a decision about them. Analysing or predicting their personal preferences, behaviours and attitudes.

This policy applies to all Processing of Personal Data in electronic form (including electronic mail and documents created with word processing software) or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

This policy has been designed to establish a worldwide baseline standard for the Processing and protection of Personal Data by all GHC (UK) Ltd. Entities. Where national law imposes a requirement, which is stricter than imposed by this policy, the requirements in national law must be followed. Furthermore, where national law imposes a requirement that is not addressed in this policy, the relevant national law must be adhered to.

If there are conflicting requirements in this policy and national law, please consult with Data Protection Officer for guidance. The protection of Personal Data belonging to GHC (UK) Ltd. Employees is not within the scope of this policy. It is covered in the GHC (UK) Ltd. Data Protection policy. GDPR Data Protection Policy

3. Definitions

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Employee: An individual who works part-time or full-time for GHC (UK) Ltd. under a contract of employment, whether oral or written, express or implied, and has recognised rights and duties. Includes temporary employees and independent contractors.

Third Party: An external organisation with which GHC (UK) Ltd. conducts business and is also authorised to, under the direct authority of GHC (UK) Ltd., Process the Personal Data of GHC (UK) Ltd. Contacts.
Personal Data Any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person.

Contact: Any past, current or prospective GHC (UK) Ltd. customer. Identifiable Natural Person Anyone who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data Controller: A natural or legal person, Public Authority, Agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
GHC (UK) Ltd. Entity A GHC (UK) Ltd. establishment, including subsidiaries and joint ventures over which GHC (UK) Ltd. exercise management control.

Data Subject: The identified or Identifiable Natural Person to which the data refers. Process, Processed, Processing Any operation or set of operations performed on Personal Data or on sets of Personal Data, whether by automated means. Operations performed may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Protection: The process of safeguarding Personal Data from unauthorised or unlawful disclosure, access, alteration, Processing, transfer or destruction.

Data Protection Authority an Independent Public Authority responsible for monitoring the application of the relevant Data Protection regulation set forth in national law. Data Processors A natural or legal person, Public Authority, Agency or other body which Processes Personal Data on behalf of a Data Controller. Consent Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Special Categories of Data Personal Data pertaining to or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data. Third Country Any country not recognised as having an adequate level of legal protection for the rights and freedoms of Data Subjects in relation to the Processing of Personal Data. Profiling Any form of automated processing of Personal Data where Personal Data is used to evaluate specific or general characteristics relating to an Identifiable Natural Person. To analyse or predict certain aspects concerning that natural person's performance at work, economic situations, health, personal preferences, interests, reliability, behaviour, location or movement. Binding Corporate Rules, The Personal Data protection policies used for the transfer of Personal Data to one or more Third Countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.

Personal Data Breach: A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

Encryption The process of converting information or data into code, to prevent unauthorised access.

Pseudonymisation Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) without a "key" that allows the data to be re-identified. Anonymization Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.

Governance

Data Protection Officer

To demonstrate our commitment to Data Protection, and to enhance the effectiveness of our compliance efforts, GHC (UK) Ltd. has established a Data Protection Officer. The Office operates with independence and is staffed by suitability skilled individuals granted all necessary authority. The Data Protection Officer reports to GHC (UK) Ltd.'s Operations Director who has direct access to the GHC (UK) Ltd.

Ensuring the alignment of this policy with Data Protection regulations, national law or Union based Data Protection provisions; Providing guidance with regards to carrying out Data Protection Impact Assessments (DPIAs);

Acting as a point of contact for and cooperating with Data Protection Authorities (DPAs);

Determining the need for notifications to one or more DPAs because of GHC (UK) Ltd.'s current or intended Personal Data processing activities;

Making and keeping current notifications to one or more DPAs because of GHC (UK) Ltd.'s current or intended Personal Data processing activities;

The establishment and operation of a system providing prompt and appropriate responses to Data Subject requests;

Informing the CEO and Operations Director of GHC (UK) Ltd. of any potential corporate, civil and criminal penalties which may be levied against GHC (UK) Ltd. and/or its Employees for violation of applicable Data Protection laws.

Ensuring establishment of procedures and standard contractual provisions for obtaining compliance with this Policy by any Third Party who: provides Personal Data to a GHC (UK) Ltd. Entity receives Personal Data from a GHC (UK) Ltd. Entity has access to Personal Data collected or processed by a GHC (UK) Ltd.

Policy Dissemination & Enforcement

The management team of each GHC (UK) Ltd. Entity must ensure that all GHC (UK) Ltd. Employees responsible for the Processing of Personal Data are aware of and comply with the contents of this policy.

In addition, each GHC (UK) Ltd. Entity will make sure all Third Parties engaged to Process Personal Data on their behalf (i.e. their Data Processors) are aware of and comply with the contents of this policy. Assurance of such compliance must be obtained from all Third Parties, whether companies or individuals, prior to granting them access to Personal Data controlled by GHC (UK) Ltd.

Data Protection by Design

To ensure that all Data Protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each of them must go through an approval process before continuing.

Each GHC (UK) Ltd. Entity must ensure that a Data Protection Impact Assessment (DPIA) is conducted, in cooperation with the Data Protection Officer, for all new and/or revised systems or processes for which it has responsibility. The subsequent findings of the DPIA must then be submitted to the Operations Director for review and approval. Where applicable, the Information Technology (IT) department (Orbits IT), as part of its IT system and application design review process, will cooperate with the Data Protection Officer to assess the impact of any new technology uses on the security of Personal Data.

Compliance Monitoring

To confirm that an adequate level of compliance that is being achieved by all GHC (UK) Ltd. Entities in relation to this policy, the Data Protection Officer will carry out an annual Data Protection compliance audit for all such Entities. Each audit will, as a minimum, assess:

- The effectiveness of Data Protection related operational practices, including: Data Subject rights.
- Personal Data transfers.
- Personal Data incident management.
- Personal Data complaints handling.
- The level of understanding of Data Protection policies and Privacy Notices.
- The currency of Data Protection policies and Privacy Notices.
- The accuracy of Personal Data being stored.
- The conformity of Data Processor activities.
- The adequacy of procedures for redressing poor compliance and Personal Data Breaches.

The Data Protection Officer, in cooperation with key business stakeholders from each GHC (UK) Ltd. Entity, will devise a plan with a schedule for correcting any identified deficiencies within a defined and reasonable time frame. Any major deficiencies identified will be reported to and monitored by the GHC (UK) Ltd. CEO.

Data Protection Principles

GHC (UK) Ltd. has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of Personal Data:

Principle 1: Lawfulness, Fairness and Transparency

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means, GHC (UK) Ltd. must tell the Data Subject what processing will occur (transparency), the Processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in the applicable Data Protection regulation (lawfulness).

Principle 2: Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes. This means GHC (UK) Ltd. must specify exactly what the Personal Data collected will be used for and limit the Processing of that Personal Data to only what is necessary to meet the specified purpose.

Principle 3: Data Minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed. This means GHC (UK) Ltd. must not store any Personal Data beyond what is strictly required.

Principle 4: Accuracy

Personal Data shall be accurate and, kept up to date.

This means GHC (UK) Ltd. must have in place processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.

Principle 5: Storage Limitation

Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is Processed. This means GHC (UK) Ltd. must, wherever possible, store Personal Data in a way that limits or prevents identification of the Data Subject.

Principle 6: Integrity & Confidentiality

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing, and against accidental loss, destruction or damage. GHC (UK) Ltd. must use appropriate technical and organisational measures to ensure the integrity and confidentiality of Personal Data is maintained always.

Principle 7: Accountability

The Data Controller shall be responsible for and be able to demonstrate compliance. This means GHC (UK) Ltd. must demonstrate that the six Data Protection Principles (outlined above) are met for all Personal Data for which it is responsible.

Data Collection

Data Sources

Personal Data should be collected only from the Data Subject unless one of the following apply:

- The nature of the business purpose necessitates collection of the Personal Data from other persons or bodies.
- The collection must be carried out under emergency circumstances to protect the vital interests of the Data Subject or to prevent serious loss or injury to another person.
- If Personal Data is collected from someone other than the Data Subject, the Data Subject must be informed of the collection unless one of the following apply:
 - The Data Subject has received the required information by other means.
 - The information must remain confidential due to a professional secrecy obligation
 - A national law expressly provides for the collection, Processing or transfer of the Personal Data.

Where it has been determined that notification to a Data Subject is required, notification should occur promptly, but in no case later than:

One calendar month from the first collection or recording of the Personal Data

At the time of first communication if used for communication with the Data Subject

At the time of disclosure if disclosed to another recipient.

Data Subject Consent

Each GHC (UK) Ltd. Entity will obtain Personal Data only by lawful and fair means and, where appropriate with the knowledge and Consent of the individual concerned. Where a need exists to request and receive the Consent of an individual prior to the collection, use or disclosure of their Personal Data, GHC (UK) Ltd. is committed to seeking such Consent.

The Data Protection Officer, in cooperation with the Operations Director and other relevant business representatives, shall establish a system for obtaining and documenting Data Subject Consent for the collection, Processing, and/or transfer of their Personal Data. The system must include provisions for:
Determining what disclosures should be made to obtain valid Consent.

Ensuring the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language.

Ensuring the Consent is freely given (i.e. is not based on a contract that is conditional to the Processing of Personal Data that is unnecessary for the performance of that contract).

Documenting the date, method and content of the disclosures made, as well as the validity, scope, and volition of the Consents given.

Providing a simple method for a Data Subject to withdraw their Consent at any time.

Data Subject Notification

Each GHC (UK) Ltd. Entity will, when required by applicable law, contract, or where it considers that it is reasonably appropriate to do so, provide Data Subjects with information as to the purpose of the Processing of their Personal Data.

When the Data Subject is asked to give Consent to the Processing of Personal Data and when any Personal Data is collected from the Data Subject, all appropriate disclosures will be made, in a manner that draws attention to them, unless one of the following apply:

- The Data Subject already has the information
- A legal exemption applies to the requirements for disclosure and/or Consent.

The disclosures may be given orally, electronically or in writing. If given orally, the person making the disclosures should use a suitable script or form approved in advance by the Data Protection Officer. The associated receipt or form should be retained, along with a record of the facts, date, content, and method of disclosure.

External Privacy Notices

Each external website provided by a GHC (UK) Ltd. Entity will include an online 'Privacy Notice' and an online 'Cookie Notice' fulfilling the requirements of applicable law. Refer to GHC (UK) Ltd.'s 'Internet Privacy Notice' and 'Internet Cookie Notice' standard templates for guidance. All Privacy and Cookie Notices must be approved by the Data Protection Officer prior to publication on any GHC (UK) Ltd. external website.

Data Use

Data Processing

GHC (UK) Ltd. uses the Personal Data of its Contacts for the following broad purposes:

- The general running and business administration of GHC (UK) Ltd. Entities.
- To provide services to GHC (UK) Ltd. customers.

The ongoing administration and management of customer services. The use of a Contact's information should always be considered from their perspective and whether the use will be within their expectations or if they are likely to object. For example, it would clearly be within a Contact's expectations that their details will be used by GHC (UK) Ltd. to respond to a Contact request for information about the products and services on offer. However, it will not be within their reasonable expectations that GHC (UK) Ltd. would then provide their details to Third Parties for marketing purposes.

Each GHC (UK) Ltd. Entity will Process Personal Data in accordance with all applicable laws and applicable contractual obligations. More specifically, GHC (UK) Ltd. will not Process Personal Data unless at least one of the following requirements are met:

The Data Subject has given Consent to the Processing of their Personal Data for one or more specific purposes.

There are some circumstances in which Personal Data may be further processed for purposes that go beyond the original purpose for which the Personal Data was collected. When deciding as to the compatibility of the new reason for Processing, guidance and approval must be obtained from the Data Protection Officer before any such Processing may commence.

In any circumstance where Consent has not been gained for the specific Processing in question, GHC (UK) Ltd. will address the following additional conditions to determine the fairness and transparency of any Processing beyond the original purpose for which the Personal Data was collected:

Any link between the purpose for which the Personal Data was collected and the reasons for intended further Processing.

The context in which the Personal Data has been collected, regarding the relationship between Data Subject and the Data Controller.

The nature of the Personal Data, whether Special Categories of Data are being Processed, or whether Personal Data related to criminal convictions and offences are being Processed.

The possible consequences of the intended further Processing for the Data Subject.

The existence of appropriate safeguards pertaining to further Processing, which may include Encryption, Anonymisation or Pseudonymisation.

Special Categories of Data

GHC (UK) Ltd. will only Process Special Categories of Data (also known as sensitive data) where the Data Subject expressly consents to such Processing or where one of the following conditions apply:

- The Processing relates to Personal Data which has already been made public by the Data Subject.
- The Processing is necessary for the establishment, exercise or defence of legal claims.
- The Processing is specifically authorised or required by law.
- The Processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law related to the Processing of genetic data, biometric data or data concerning health.

Special Categories of Data

In any situation where, Special Categories of Data are to be Processed, prior approval must be obtained from the Data Protection Officer and the basis for the Processing clearly recorded with the Personal Data in question.

Where Special Categories of Data are being Processed, GHC (UK) Ltd. will adopt additional protection measures. Each GHC (UK) Ltd. Entity may also adopt additional measures to address local custom or social expectation over the Processing of Special Categories of Data.

4.4.5 Profiling & Automated Decision-Making

GHC (UK) Ltd. will only engage in Profiling and automated decision-making where it is necessary to enter into, or to perform, a contract with the Data Subject or where it is authorised by law.

Where a GHC (UK) Ltd. Entity utilises Profiling and automated decision-making, this will be disclosed to the relevant Data Subjects. In such cases the Data Subject will be given the opportunity to:

- Express their point of view.
- Obtain an explanation for the automated decision.
- Review the logic used by the automated system.
- Supplement the automated system with additional data.
- Have a human carry out a review of the automated decision.
- Contest the automated decision.
- Object to the automated decision-making being carried out.

Each GHC (UK) Ltd. Entity must also ensure that all Profiling and automated decision-making relating to a Data Subject is based on accurate data.

Correction may include data erase and replacement with corrected or supplemented data.

Digital Marketing

As a rule, GHC (UK) Ltd. will not send promotional or direct marketing material to a GHC (UK) Ltd. Contact through digital channels such as mobile phones, email and the Internet, without first obtaining their Consent. Any GHC (UK) Ltd. Entity wishing to carry out a digital marketing campaign without obtaining prior Consent from the Data Subject must first have it approved by the Data Protection Officer.

Where Personal Data Processing is approved for digital marketing purposes, the Data Subject must be informed at the point of first contact that they have the right to object, at any stage, to having their data Processed for such purposes. If the Data Subject puts forward an objection, digital marketing related Processing of their Personal Data must cease immediately, and their details should be kept on a suppression list with a record of their opt-out decision, rather than being completely deleted.

It should be noted that where digital marketing is carried out in a 'business to business' context, there is no legal requirement to obtain an indication of Consent to carry out digital marketing to individuals provided that they are given the opportunity to opt-out.

Data Retention

To ensure fair Processing, Personal Data will not be retained by GHC (UK) Ltd. for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further Processed. The length of time for which GHC (UK) Ltd. Entities need to retain Personal Data is set out in the GHC (UK) Ltd. 'Personal Data Retention Schedule'. This takes into account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule. All Personal Data should be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

Data Protection

Each GHC (UK) Ltd. Entity will adopt physical, technical, and organisational measures to ensure the security of Personal Data. This includes the prevention of loss or damage, unauthorised alteration, access or Processing, and other risks to which it may be exposed by human action or the physical or natural environment.

A summary of the Personal Data related security measures is provided below:

Prevent unauthorised persons from gaining access to data processing systems in which Personal Data are processed.

- Prevent persons entitled to use a data processing system from accessing Personal Data beyond their needs and authorisations.
- Ensure that Personal Data during electronic transmission during transport cannot be read, copied, modified or removed without authorisation.
- Ensure that access logs are in place to establish whether, and by whom, the Personal Data was entered into, modified on or removed from a data processing system.
- Ensure that in the case where Processing is carried out by a Data Processor, the data can be processed only in accordance with the instructions of the Data Controller.
- Ensure that Personal Data is protected against undesired destruction or loss.
- Ensure that Personal Data collected for different purposes can and is Processed separately.
- Ensure that Personal Data is not kept longer than necessary.

Data Subject Requests

The Data Protection Officer will establish a system to enable and facilitate the exercise of Data Subject rights related to:

- Information access.
- Objection to Processing.
- Objection to automated decision-making and profiling.
- Restriction of Processing.
- Data portability.
- Data rectification.
- Data erasure.

If an individual makes a request relating to any of the rights listed above, GHC (UK) Ltd. will consider each such request in accordance with all applicable Data Protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be unnecessary or excessive in nature.

Data Subjects are entitled to obtain, based upon a request made in writing to the Data Protection Officer and upon successful verification of their identity, the following information about their own Personal Data:

- The purposes of the collection, Processing, use and storage of their Personal Data.
- The source(s) of the Personal Data, if it was not obtained from the

Data Protection Training

All GHC (UK) Ltd. Employees that have access to Personal Data will have their responsibilities under this policy outlined to them as part of their staff induction training. In addition, each GHC (UK) Ltd. Entity will provide regular Data Protection training and procedural guidance for their staff.

- The training and procedural guidance set forth will consist of, at a minimum, the following elements:
- The Data Protection Principles set forth in Section 4.2 above.
- Each Employee's duty to use and permit the use of Personal Data only by authorised persons and for authorised purposes.
- The need for, and proper use of, the forms and procedures adopted to implement this policy.
- The correct use of passwords, security tokens and other access mechanisms.
- The importance of limiting access to Personal Data, such as by using password protected screen savers and logging out when systems are not being attended by an authorised person.
- Securely storing manual files, print outs and electronic storage media.
- The need to obtain appropriate authorisation and utilise appropriate safeguards for all transfers of Personal Data outside of the internal network and physical office premises.
- Proper disposal of Personal Data by using secure shredding facilities.
- Any special risks associated with departmental activities or duties.

Complaints Handling

Data Subjects with a complaint about the Processing of their Personal Data, should put forward the matter in writing to the Data Protection Officer. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. The Data Protection Officer will inform the Data Subject of the progress and the outcome of the complaint within a reasonable period.

If the issue cannot be resolved through consultation between the Data Subject and the Data Protection Officer, then the Data Subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction.

Breach Reporting

Any individual who suspects that a Personal Data Breach has occurred due to the theft or exposure of Personal Data must immediately notify the Data Protection Officer providing a description of what occurred. Notification of the incident can be made via e-mailing or direct contact with the Operations Director.

The Data Protection Officer will investigate all reported incidents to confirm whether a Personal Data Breach has occurred. If a Personal Data Breach is confirmed, the Data Protection Officer will follow the relevant authorised procedure based on the criticality and quantity of the Personal Data involved. For severe Personal Data Breaches, the GHC (UK) Ltd. Operations Director will initiate and chair an emergency response team to coordinate and manage the Personal Data Breach response.

Information Requiring Notification	With Consent	Without Consent
<ul style="list-style-type: none"> The identity and the contact details of the Data Controller and, where applicable, of the Data Controller's representative. The original source of the Personal Data, and if applicable, whether it came from a publicly accessible source. The contact details of the Data Protection Officer, where applicable. The purpose(s) and legal basis for Processing the Personal Data. The categories of Personal Data concerned. The recipients or categories of recipients of the Personal Data. Where the Data Controller intends to further Process the Personal Data for a purpose other than that for which the Personal Data was originally collected, the Data Controller shall provide the Data Subject, prior to that further Processing, with information on that other purpose. Where the Data Controller intends to transfer Personal Data to a recipient in a Third Country, notification of that intention and details regarding adequacy decisions taken in relation to the Third Country must be provided. The period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period. Where applicable, the legitimate interests pursued by the Data Controller or by a Third Party. The existence of Data Subject rights allowing them to request from the Data Controller - information access, objection to Processing, objection to automated decision-making and profiling, restriction of Processing, data portability, data rectification and data erasure. Where Processing is based on Consent, the existence of the right to withdraw Consent at any time, without affecting the lawfulness of Processing based on Consent before its withdrawal. The right to lodge a complaint with a Data Protection Authority. The existence of automated decision-making (including Profiling) along with meaningful information about the logic involved and the significance of any envisaged consequences of such Processing for the Data Subject. Whether the provision of Personal Data is a statutory or contractual requirement, a requirement necessary to enter into a contract, as well as whether the Data Subject is obliged to provide the Personal Data and if so the possible consequences of failure to provide such data. 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ 	<ul style="list-style-type: none"> ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

Signed by Zulfigar Khan - GHC Ltd

Signature:



Date: 03.08.2022