

Application of Local Laws

Entrepreneur David Dymshyts (trade name DD-CARGO, hereinafter DD-CARGO) is responsible for compliance with this Policy. If there is reason to believe that local law requirements or other legal obligations contradict the duties under this Policy, DD-CARGO will work to find a practical solution that reconciles these requirements.

Policy Overview

DD-CARGO is committed to compliance with applicable data privacy laws, regulations, internal policies and standards. These protections form the foundation of a trustworthy company, are necessary to maintain the confidence of customers and employees and ensure the company's own compliance with such local laws. This Policy is based on globally accepted basic principles on data protection and applies worldwide to all employees of Familia-International.

Definitions

Personal Data — Any information that can directly or indirectly be used to identify a natural person, whether that individual is an employee, a customer or employee of a customer, a vendor or employee of a vendor, a job applicant or any other third party.

Examples: names; government-issued identification numbers; addresses; phone numbers; email addresses; photos.

Processing — Any operation performed on Personal Data, with or without the use of automated systems, such as to collect, store, organize, retain, archive, record, view, modify, adapt, alter, query, use, retrieve, forward, transmit or combine data. This also includes disposing of, deleting, erasing, destroying or blocking data.

Examples: storing information in databases; viewing information stored on another computer; transferring information from one database to another.

Data Quality

Personal Data should be accurate, and if necessary, kept up to date.

Security Safeguards

Personal Data must be protected using technical, managerial and physical security measures against risk of loss or unauthorized access, destruction, use, modification or disclosure.

Transparency

Individuals must be notified at the time of collection how their Personal Data is being used or Processed. They must be aware of who is collecting the Personal Data, the purpose for the Processing of the Personal Data and if third parties will Process the Personal Data, that adequate safeguards are in place. All such notices must be approved by the Legal Department.

Individual Participation

To the extent required by local law, individuals have a right to access their Personal Data and, where appropriate, to correct or delete it and exercise any other right provided by local law.

Data Protection Principles

Personal Data will be collected, recorded and used in a proper and professional manner, whether the Personal Data is on paper, in computer records or recorded by any other means. DD-CARGO is accountable for and must be able to demonstrate compliance with the following principles of data protection.

Fair and Lawful

When Processing Personal Data, the rights of the individual related to their Personal Data must be protected. Personal Data must be collected and Processed fairly and lawfully.

Purpose Specification

Personal Data can be used or Processed only for the purpose defined at the time of collection and shall not be further used or Processed in any manner incompatible with that purpose.

Collection Limitation

DD-CARGO only collects Personal Data necessary to meet the specified purpose at the time of collection and only to the extent allowed by local law.

Deletion

Personal Data no longer needed for the purpose specified at the time of collection shall be deleted according to applicable retention schedules unless it is subject to an exception from the Legal Department.

Security and Access

Personal Data is classified as confidential. Any unauthorized Processing of such data by employees is prohibited. Any Processing undertaken by an employee that is not part of his or her legitimate duties is prohibited. Employees may have access to Personal Data only as is appropriate for the type and scope of the task in question. This requires the definition and separation, as well as implementation, of roles and responsibilities.

Employees are prohibited from using Personal Data outside of the scope of their employment at Familia-International, to disclose it to unauthorized persons or to make it available in any other way outside the permitted business use. Supervisors must inform their employees at the start of the employment relationship about the obligation to protect Personal Data. This obligation shall remain in force even after employment has ended.

Personal Data must be safeguarded from unauthorized access and unlawful Processing or disclosure. This applies regardless of whether data is Processed electronically or in paper form. Before the introduction of new methods of data Processing, a privacy impact assessment should be performed for new IT systems, which may lead to implementing technical and organizational measures to protect Personal Data.

Employees are expected to follow DD-CARGO Information Security Standards, which can be found by searching keyword "standards." Note that Information Security classifies all data as Sensitive, Internal or Public. Depending on its classification, Personal Data must be protected in accordance with the applicable Information Security Standards.

In the event of suspicious activity, suspected cyberattack, suspected security incident, or possible breach of Personal Data, all DD-CARGO employees must notify Information Security immediately via the email office@familia-international.com.

Special Circumstances

Data Transferring or Processing by Third Parties

Personal Data may not be transferred to a country outside the country of origin unless the transfer has been approved by the Legal Department, who will ensure an adequate level of data protection or suitable safeguards are in place. If a vendor or third party is engaged to Process Personal Data, a data transfer agreement must be in place with that external provider. An external provider can Process Personal Data only in accordance with instructions from Familia-International.

Processing of Special Categories of Personal Data

Special categories of Personal Data that are highly sensitive can be Processed only under certain conditions. These categories include an individual's racial and ethnic origin, political beliefs, religious or philosophical beliefs, union membership or the health and sexual life of the data subject. Under local law(s), further data categories may necessitate special treatment. Personal Data that relates to a crime can often be Processed under special requirements of local law. Leave requests, that include special categories of data, will be handled by managers of Familia-International.

Telecommunications and Internet

Telephone equipment, email addresses, intranet and Internet, along with internal social networks are provided primarily for work-related assignments. They can be used within the applicable legal regulations and internal policies. In the event of limited acceptable usage for private purposes, the local laws on secrecy of telecommunications and any local telecommunication laws must be observed.

Communication and Responsibilities

All Employees are responsible for:

Reading and complying with this Policy and related policies, along with related documents/guidelines that may be developed and maintained to implement the requirements of this Policy.

Reporting violations of this Policy.

Management is additionally responsible for:

Ensuring all reporting personnel understand the requirements of this Policy.

Ensuring appropriate safeguards are in place to protect Personal Data.

Providing all necessary training and/or guidance to assist with the implementation process, and for monitoring compliance with this Policy.

Policy Custodian

Global Chief Compliance & Governance Officer

Adoption Date

This Policy was adopted effective January 3, 2020.