

BCMstrategy, Inc.

Data Protection Policy

February 2020

BCMstrategy, Inc. is committed to treating information regarding employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. We accomplish this goal by ensuring that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Core Principle

BCMstrategy, Inc. will never share or sell personally identifiable data regarding its employees, customers, or vendors to third parties. Personally identifiable data will only be shared with law enforcement or other official sector entities following production of a legally enforceable requirement to deliver data for law enforcement or regulatory use.

Scope

BCMstrategy, Inc. employees must follow this policy. Contractors, consultants, partners and any other external entity are also covered.

Policy elements

As part of our operations, we need to obtain and process information including, but not limited to, 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, and platform usage data.

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 BCMstrategy, Inc. within legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties
- Distributed only based on explicit agreement with the data's owner (exempting legitimate requests from law enforcement authorities)

Transparency

BCMstrategy, Inc. is committed to providing transparency regarding its data protection policies. Specifically, we commit to:

- Informing people about which of their data is collected
- Informing people about how that data will be processed
- Informing people about who has access to their information
- Creating processes for addressing cases when data has been lost, corrupted or compromised
- Permitting people to request that we modify, erase, reduce, or correct personally identifiable data contained in our databases

Actions

To exercise data protection, BCMstrategy, Inc. will take the following actions:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- 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 (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.