



# GDPR Policy

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## CAREPAY Solutions Ltd – GDPR Policy.

### 1. Introduction

CAREPAY Solutions Ltd ("the Company") is committed to protecting the privacy and security of personal data in compliance with the General Data Protection Regulation (GDPR) and all related data protection legislation.

### 2. Data Protection Principles

The Company will comply with the following data protection principles:

- ❖ Personal data shall be processed lawfully, fairly, and in a transparent manner.
- ❖ Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- ❖ Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- ❖ Personal data shall be accurate and, where necessary, kept up to date.
- ❖ 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.
- ❖ Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

### 3. Data Subject Rights

Data subjects have the following rights under the GDPR:

- ❖ The right to be informed about the processing of their personal data.
- ❖ The right of access to their personal data.
- ❖ The right to rectification of inaccurate personal data.
- ❖ The right to erasure of their personal data.
- ❖ The right to restrict processing of their personal data.
- ❖ The right to data portability.
- ❖ The right to object to the processing of their personal data.
- ❖ Rights in relation to automated decision making and profiling.

### 4. Data Security Measures

The Company will implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- ❖ The pseudonymization and encryption of personal data.
- ❖ The ability to ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems and services.
- ❖ The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

### 5. Data Breach Notification

The Company will notify the relevant supervisory authority and data subjects of any data breach without undue delay, where such breach is likely to result in a risk to the rights and freedoms of data subjects.

### 6. Data Protection Officer

The Company has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the GDPR and any related data protection laws and regulations.

### 7. Compliance

All employees of CAREPAY Solutions Ltd are required to comply with this GDPR Policy. Failure to comply may result in disciplinary action, up to and including termination of employment.

### 8. Contact Information

For any questions or concerns regarding this GDPR Policy or how the Company processes personal data, please contact our Data Protection Officer at [info@carepaysolutions.co.uk](mailto:info@carepaysolutions.co.uk)

This GDPR Policy is effective as of 1<sup>st</sup> April 2024 and may be updated from time to time in accordance with changes in Data Protection legislation.