ST/\CK & V/\ULT

GDPR Compliance

Last updated: Oct 12, 2023

Stack & Vault S.L ("us," "we," or "our") is committed to ensuring compliance with the General Data Protection Regulation (GDPR) and the protection of personal data. This GDPR Compliance Statement outlines our commitment to safeguarding individuals' privacy and data protection rights, irrespective of their location, and is valid worldwide.

Data Protection Principles

Stack & Vault S.L acknowledges and adheres to the following core principles of the GDPR:

1.1. Lawfulness, Fairness, and Transparency: We process personal data lawfully, fairly, and transparently, ensuring individuals are informed about the processing of their data.

1.2. Purpose Limitation: We collect and process personal data for specified, explicit, and legitimate purposes.

1.3. Data Minimization: We limit data collection to what is necessary for the purposes for which it was obtained.

1.4. Accuracy: We strive to maintain accurate and up-to-date personal data, allowing individuals to rectify inaccuracies.

1.5. Storage Limitation: We retain data for the duration necessary for the intended purposes.

1.6. Integrity and Confidentiality: We implement appropriate security measures to protect personal data from unauthorized access, disclosure, or destruction.

1.7. Accountability and Responsibility: We take responsibility for our data processing activities and demonstrate compliance with the GDPR's requirements.

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Legal Basis for Processing

We ensure that we have a valid legal basis for processing personal data, such as:

Consent: When individuals have given clear, informed, and unambiguous consent.

Contractual Necessity: When data processing is necessary for the performance of a contract.

Legal Obligations: When processing is required to comply with legal obligations.

Legitimate Interests: When processing is based on our legitimate interests, provided they do not override individuals' rights and interests.

Data Subject Rights

We respect the rights of data subjects under the GDPR, which include:

- Right to Access
- Right to Rectification
- Right to Erasure (Right to be Forgotten)
- Right to Data Portability
- Right to Object
- Right not to be Subject to Automated Decision-Making
- Right to Withdraw Consent

International Data Transfers

When transferring personal data internationally, we ensure that adequate safeguards are in place to protect data subjects' rights and data privacy, including the use of standard contractual clauses, binding corporate rules, or other lawful mechanisms.

Data Protection Impact Assessments (DPIAs)

We conduct Data Protection Impact Assessments as required by the GDPR, particularly when processing operations are likely to result in high risks to data subjects' rights and freedoms.

Data Breach Notification

We have procedures in place to detect, report, and investigate data breaches in compliance with the GDPR's notification requirements.

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Data Protection Officer (DPO)

We have appointed a Data Protection Officer responsible for monitoring GDPR compliance, providing advice on data protection issues, and serving as a point of contact for data subjects.

Vendor and Third-Party Compliance

We assess the GDPR compliance of our vendors and third-party service providers, ensuring that they meet the necessary data protection requirements.

Training and Awareness

We provide GDPR training and raise awareness among our employees regarding data protection, privacy, and their responsibilities.

Privacy by Design

We implement privacy by design and by default principles in our data processing activities.

Review and Updates

We review our GDPR compliance measures regularly, update our policies and procedures as needed, and adapt to changes in data protection regulations.

If you have questions or concerns about our GDPR compliance or the protection of your personal data, please contact us at:

<u>contact@stacknvault.com</u>

This GDPR Compliance Statement is effective as of the "Last updated" date mentioned above and is applicable worldwide for all users of Stack & Vault S.L's services. Please note that this document is a template and may need to be customized to meet your specific needs and comply with relevant legal requirements. We recommend consulting with legal counsel to ensure compliance with applicable data protection laws in various jurisdictions.

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