

Privacy Policy

Company Policy

APOL-051

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Table of Contents

1 DOCUMENT CONTROL 2
2 DISTRIBUTION 2
3 VALIDITY 2
4 REFERENCE 2
5 DEFINITIONS 2
6 COMPLIANCE 2
7 PURPOSE 3
8 SCOPE 3
9 RESPONSIBILITIES 3
9.1 Board and Senior Management 3
9.2 GDPR Committee 4
9.3 Managers 4
9.4 Employees and Contractors 4
9.5 IT support 4
10 THE POLICY 4
10.1 Policy Statement 4
10.2 Privacy Principles 4
10.2.1 Lawful Basis for Processing 4
10.2.2 Purpose Limitation 5
10.2.3 Data Minimization 5
10.2.4 Accuracy 5
10.2.5 Storage Limitation 5
10.2.6 Integrity and Confidentiality 5
10.2.7 Accountability 5
10.3 Collection and Website Privacy 5
10.4 Data Subject Rights 6
10.5 Third-Party Processing and International Transfers of Personal Data 6
10.6 Data Breaches 6
10.7 Monitoring and Compliance 6
10.8 Review 7

Table of Figures

No table of figures entries found.

List of Tables

Table 1. Document control 2

1 Document Control

This section defines who prepared, checked and approved this document version.

Date	V.	Prepared	Checked	Approved	Comments
19/08/2026	1	Enea Di Mauro	Brian Ritschel	Jun Zhang	Creation

Table 1. Document control

2 Distribution

This company policy applies to all the companies in the Atmos Group.

3 Validity

This policy is applicable from the date of issue and takes the place of any previous policy on this subject. It will be valid until a new version is published. Please also note that any specific local laws will take precedence over this guideline if the two differ.

4 Reference

This section lists any other documents or regulations that are connected with this policy:

- **Privacy Notices**
  - Customers and Website Users
  - Job Applicants
  - Employees
- **IPP.49(UK)** General Data Protection Procedure
- **IPP.53(US)** General Data Protection Procedure
- **APOL-005** Atmos Information Security Policy
- **APOL-017** Mobile Devices Policy
- **DCRR** Data Classification and Retention Register
- **DSAR** Data Subject Access Request (Template)
- **DBR** Data Breach Register
- **GTPPA** GDPR Third-Party Data Processing Agreement
- **GDPTC** General Data Protection Terms and Conditions

5 Definitions

This section lists any specific terminology used within this policy:

GDPR General Data Protection Regulation
PII Personally Identifiable Information
DSAR Data Subject Access Request

6 Compliance

The following legislation and regulations inspired the production of this document:

- **UK GDPR**
- **EU GDPR**
- **UK Data Protection Act 2018**
- **Costa Rica: Personal Data Protection Law 8968**

- Applicable national privacy, data protection, and electronic communications legislation in countries where Atmos International operates

7 Purpose

Atmos International is committed to protecting the privacy and personal data of employees, customers, suppliers, job applicants, website users, contractors, and other individuals whose personal information is processed by the company.

The purpose of this Privacy Policy is to:

- Demonstrate Atmos International's commitment to protecting personal data.
- Establish the principles under which personal data is collected, used, stored, shared, retained, and disposed of.
- Support compliance with regulations
- Define responsibilities for privacy and data protection throughout the organization.
- Support the implementation of the Atmos Information Security Management System (ISMS).

8 Scope

This policy applies to:

- All Atmos International companies and offices.
- All employees, contractors, agency staff, consultants, and temporary workers.
- All personal data processed by Atmos International in any format, including:
  - Electronic records
  - Paper records
  - Audio recordings
  - Video recordings
  - Photographs
  - CCTV recordings
  - Website-generated information
  - Mobile applications
  - Cloud-hosted systems
- Atmos International’s corporate websites and online services.

This policy covers personal data relating to:

- Employees
- Former employees
- Job applicants
- Customers
- Suppliers
- Contractors
- Website visitors
- Event attendees
- Other identifiable individuals

9 Responsibilities

9.1 Board and Senior Management

Senior management shall:

- Demonstrate commitment to privacy and data protection.
- Ensure adequate resources are available.
- Review privacy performance through management review activities.
- Approve privacy-related policies and procedures.

9.2 GDPR Committee

The GDPR Committee shall:

- Oversee organizational compliance with privacy legislation.
- Monitor privacy-related risks.
- Review significant incidents and data breaches.
- Approve privacy guidance and supporting procedures.
- Coordinate responses to regulatory enquiries.

9.3 Managers

Managers shall:

- Ensure personnel under their control comply with this policy.
- Authorize access to personal data only where necessary.
- Report privacy concerns and breaches promptly.

9.4 Employees and Contractors

All personnel shall:

- Process personal data only for authorized purposes.
- Protect personal data from unauthorized disclosure.
- Follow information classification and retention requirements.
- Immediately report suspected privacy incidents or breaches.

9.5 IT support

IT shall:

- Implement technical security controls protecting personal data.
- Manage access control mechanisms.
- Secure company systems hosting personal information.

10 The policy

10.1 Policy Statement

Atmos International recognizes privacy as a *fundamental right* and is committed to ensuring that personal data is processed lawfully, fairly, transparently, and securely.
Personal data shall only be collected and processed where there are a legitimate and documented business purpose and an appropriate legal basis for processing.
The organization shall maintain suitable administrative, technical, and physical controls to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

10.2 Privacy Principles

Atmos International shall process personal data according to the principles shown below.

10.2.1 Lawful Basis for Processing

Atmos International shall only process personal data where a valid legal basis exists. Individuals shall be provided with appropriate privacy information when personal data is collected or obtained, through Privacy Notices or other communication methods as required by applicable privacy legislation.
Personal data may be processed on one or more of the following lawful bases:

1. The individual has provided consent for one or more specific purposes.
2. Processing is necessary for the performance of a contract or to take steps prior to entering into a contract.
3. Processing is necessary to comply with a legal or regulatory obligation.
4. Processing is necessary to protect the vital interests of an individual.
5. Processing is necessary for the legitimate interests of Atmos International or a third party, provided such interests do not override the rights and freedoms of affected individuals.
6. Processing is necessary for the performance of a task carried out in the public interest where permitted by law.

10.2.2 Purpose Limitation

Personal data shall only be collected for specified, explicit, and legitimate purposes.
Data shall not be processed for incompatible purposes without appropriate justification.

10.2.3 Data Minimization

Only the minimum personal data necessary to achieve the legitimate business purpose shall be collected and processed.

10.2.4 Accuracy

Reasonable steps shall be taken to ensure personal data remains accurate, complete, and up to date. Inaccurate information shall be corrected promptly.

10.2.5 Storage Limitation

Personal data shall not be kept longer than necessary.
Retention periods shall be defined within the Data Classification and Retention Register.

10.2.6 Integrity and Confidentiality

Appropriate security measures shall protect personal data against:

- Unauthorized access
- Accidental loss
- Alteration
- Corruption
- Destruction
- Disclosure

10.2.7 Accountability

Atmos International shall maintain evidence demonstrating compliance with privacy legislation and this policy.

10.3 Collection and Website Privacy

The company may collect information through the following methods:

- Contact forms
- Job application forms
- Technical support forms
- Event registration forms
- Cookies and analytics technologies
- Data Subject Access Request forms

Where personal information is collected via a website:

- Visitors shall be provided with our Privacy Notice.

- Cookie usage shall be explained where applicable.
- Information shall only be collected for legitimate purposes.
- Appropriate technical safeguards shall be implemented.
- Personal data shall not be sold to third parties.
- Website visitors shall be informed of their privacy rights and how to exercise them.

10.4 Data Subject Rights

Atmos International shall facilitate the lawful exercise of privacy rights including:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights relating to automated decision making

Requests shall be handled in accordance with applicable legislation and internal procedures.

10.5 Third-Party Processing and International Transfers of Personal Data

Where third parties process personal data on behalf of Atmos International:

- Appropriate due diligence shall be performed.
- Suitable contractual safeguards shall be established.
- Data Processing Agreements shall be implemented where required.
- Third parties shall only use data for authorized purposes.

As a global organization, Atmos International may transfer personal data between group companies, service providers, customers, suppliers, and business partners located in different countries.
Where personal data is transferred outside the country or region in which it was originally collected, Atmos International shall ensure that appropriate safeguards are implemented in accordance with applicable privacy legislation.
Appropriate safeguards may include contractual protections, adequacy decisions, approved transfer mechanisms, and technical or organizational security measures.

10.6 Data Breaches

Atmos International shall maintain documented processes for the identification, reporting, investigation, management, and notification of personal data breaches in accordance with applicable legislation and internal procedures.

All suspected or confirmed personal data breaches shall be reported without undue delay and managed through the organization's Incident Response Procedure and associated privacy management processes.

10.7 Monitoring and Compliance

Compliance with this policy may be verified through:

- Internal audits
- Management reviews
- Privacy assessments
- Supplier evaluations
- Security monitoring activities

Non-compliance may result in disciplinary action and/or contractual remedies.

10.8 Review

This policy shall be reviewed at least annually or sooner where:

- Legislation changes.
- Significant processing activities are introduced.
- Regulatory guidance changes.
- Material privacy incidents occur.



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