

# **Security Policy for the Personal Data Processing** **in Erca Wilmar Cosmetic Ingredients Sp. z o.o.**

## **I. GENERAL ASSUMPTIONS**

### §1.

The purpose of the Personal Data Security Policy, referred to as the "Security Policy", is to obtain optimal and consistent with the requirements of legal acts the way how to process the information containing personal data in Erca Wilmar Cosmetic Ingredients Sp. z o.o.

## **II. THE SCOPE OF APPLICATION**

### §2.

1. Erca Wilmar Cosmetic Ingredients Sp. z o.o. processes information for the recruitment process as well as during employment and post-employment period.
2. This information is processed and stored in the form of traditional and electronic documentation.
3. The Security Policy contains documents concerning technical and organizational security introduced to ensure the protection of personal data processed.

### §3.

Security Policy applies to:

1. All information concerning Erca Wilmar Cosmetic Ingredients Sp. z o.o. employee's data, including personal data of the staff and the contents of the employment contract.
2. All job candidates data collected at the recruitment stage.

3. Register of persons allowed to process personal data.
4. Other documents containing personal data.

§4.

All employees within the meaning of the Labor Code, consultants, trainees, and other people with access to protected information are obliged to apply the rules defined by the Security Policy documents.

§5.

Classified information is not covered by this Security Policy

### **III. SECURITY POLICY DOCUMENTS STRUCTURE**

§6.

1. The Security Policy documents establish the management methods and requirements necessary to ensure the effective and consistent protection of the processed information.
2. A set of Safety Policy documents consists of:
  - 1) this Safety Policy document;
  - 2) Instructions for personal data processing.

### **IV. INFORMATION ACCESS**

§7.

All persons whose type of work will involve access to personal data, before starting work, shall be trained in the scope of applicable law concerning the protection of personal data and the Erca Wilmar Cosmetic Ingredients' privacy policy.

§8.

Sharing personal data to the authorized entities, under the law, should proceed in accordance with separate regulations of procedures.

## **V. INFORMATION SAFETY**

§9.

The following categories of personal data protection measures should be used in Erca Wilmar Cosmetic Ingredients Sp. z o.o.:

a) physical security:

- 24 hour monitoring of Erca Wilmar Cosmetic Ingredients' building;
- lockable rooms;
- file cabinets with locks.

b) Secure data processing in paper documentation:

- the processing of personal data takes place in designated rooms,
- the processing of personal data takes place by a person designated for this purpose,
- documents including personal data that are no longer necessary and not archived, are immediately destroyed.

d) IT security.

c) organizational security:

- The people directly responsible for data security are: users, local data administrators, Data Security Administrator (DSA);
- Data Security Administrator and local personal data administrators regularly monitor workers responsible for the processing of personal data and computer systems, according to current knowledge, with due diligence and current procedures.

§10.

1. As part of the personal data protection we secured:

- a) computer hardware - server, personal computers, printers and other external devices;
- b) data saved on disks and data processed in the system;
- c) user passwords;
- d) documentation - including system data, describing its application, processed information, etc.;
- h) prints;
- i) paper records related to the personal data processing from which data is entered into an IT system or operate independently

**VI. PERSONAL DATA MANAGEMENT**

§11.

CEO is the administrator of Erca Wilmar Cosmetic Ingredients' personal data.

§12.

1. In Erca Wilmar Cosmetic Ingredients for personal data security respond:

- 1) Personal Data Administrator – CEO;
- 2) Data Security Administrator – Finance, Accounting and Administration Specialist;
- 3) Local Data Administrators;

2. Erca Wilmar Cosmetic Ingredients' contracts with accounting offices, IT network administrators and medical services should include provisions requiring third parties to protect the personal data provided by Erca Wilmar Cosmetic Ingredients.

§13.

1. CEO delegates the responsibility resulting from the Data Protection Act to the local data administrators - organizational unit managers - as far as their employees, IT systems

and databases are concerned.

2. Erca Wilmar Cosmetic Ingredients' organizational units managers are obliged to familiarize their employees with the content of the Act of 29 August 1997 on the protection of personal data (Dz. U. z 2002 r. Nr 101, p z. 926, z p zn. zm.), the Security Policy for personal data processing, the manual for personal data management.

Organization of work in the processing of personal data and processing principles:

- a) Information Security Administrator has a list of Erca Wilmar Cosmetic Ingredients' employees authorized to process personal data;
- b) only employees who are familiar with the data protection rules, confirmed the training by the local data administrator or by DSA with a personal signature and with appropriate authorization granted by the Personal Data Administrator can process personal data;
- c) the employee is personally responsible for the security of the data entrusted to him during personal data processing;
- d) before starting personal data processing, the employee should verify that the data is adequately protected and whether these protections were not violated;
- e) the employee should ensure that data is protected against unauthorized access or the changes by not authorized persons, when personal data is processing;
- f) the employee should protect personal data against unauthorized access when finish the processing;
- g) IT administrator is responsible for software changes, updates, antivirus and network security.

## **VII. SCOPE OF LIABILITY**

### §14.

Every employee of Erca Wilmar Cosmetic Ingredients is responsible for the information security, in terms of position and information held.

§15.

Information Security Administrator in Erca Wilmar Cosmetic Ingredients:

1. is responsible for the protection of personal data specified in law 1 § 36 par. and Erca Wilmar Cosmetic Ingredients' Security Policy;
2. identifies and analyzes the risks to which personal data in Erca Wilmar Cosmetic Ingredients may be exposed;
3. specifies the needs of information systems security where personal data is processed;
4. supervises the workflow and storage of documents and publications containing personal data;
5. monitors the security system implemented to protect personal data in information systems;
6. keeps records of databases in information systems in which personal data is processed.

**VIII. ARCHIVING INFORMATION INCLUDING PERSONAL DATA**

§16.

Documents containing personal data are archived in properly secured rooms and IT or traditional media.

Data that is no longer necessary is immediately destroyed by physical and informational activities that prevent them from being read.