



## **SQFT Knowledge Services**

### **DATA PROTECTION AND PRIVACY POLICY**

## Document Revision History

Version	Document No	Date	Brief summary of changes	Prepared By	Approved By
1.0	SQFT/DPP/POL/044	03-Jan-2023	Initial version created	K. Gokhul	S.Nandhini
1.0	SQFT/DPP/POL/044	01-Mar-2023	Reviewed and No changes done	K. Gokhul	S.Nandhini
1.0	SQFT/DPP/POL/044	29-Feb-2024	Reviewed and No changes done	S.Nandhini	K. Gokhul

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**1. PURPOSE**

This policy sets out the rules relating to the protection of individuals, including staff Members, with regards to the processing of their Personal Data by SQFT KS.

**2. SCOPE**

This Policy sets out the general standard that SQFT KS has implemented when Processing Personal Data. This Policy applies when SQFT KS acts as a Data Processor. It applies to the Processing of all Personal Data, irrespective of the nature or category of the Personal Data, regardless of the media on which that data is stored.

SQFT KS is committed to Process Personal Data to the same level of protection regardless of whether it Processes Personal Data for its own needs or for the needs of its clients or any third party. The implementation of this Data Privacy Policy requires that all Members of the SQFT Legal Entities and any third party engaged by SQFT KS fully participate in its application, without any exception.

**3. DEFINITIONS**

<b>Terms</b>	<b>Definitions</b>
Personal Data	Personal Data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual. Company registration numbers, generic email addresses (such as info@company.com) and anonymized data are not considered Personal Data;
Processing	Processing means any operation or set of operations which is performed upon Personal Data or sets of Personal Data, by manual or automated means (including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data);
Data Controller	Data Controller means any Staff Member who has the authority to determine, alone or jointly with others, the purposes, conditions and means of the processing of Personal Data on behalf of the SQFT KS.
Data Processor	Data Processor means any Staff Member or other individual, legal entity, public authority or similar body, including a third party, authorized to process Personal Data on behalf and under the direct authority of the Data Controller.
Recipient	Recipient means the individual, legal entity, public authority or similar body to which Personal Data are disclosed.

Personal Data Breach	Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed;
Consent	Consent means the freely given, specific, informed and unambiguous permission expressed by an individual by which he or she agrees with the processing of his/her Personal Data. This consent is given either by a written statement or by a clear affirmative action;

#### 4. CATEGORIES OF DATA SUBJECTS

As part of its operations, SQFT KS Shall collect and Process Personal Data relating to

- Employment candidates,
- Employees and former Employees,
- Public and private clients and prospects,
- Public and private clients and prospects customers,
- Shareholders,
- Service providers, professional advisors, suppliers, contractors and subcontractors,
- Any other third parties.

#### 5. WHICH PERSONAL DATA DO WE USE?

Subject to Applicable Data Protection Legislation, some or all of the following Personal Data categories may be Processed by SQFT KS and any third party engaged by SQFT KS or providing goods and/or services to SQFT KS :

- identity and contact information (e.g. first name, last name, title, username or similar identifier)
- professional life / business information (e.g. email address, employer, department, job title, telephone numbers, billing or delivery address),
- personal information (e.g. date of birth, personal contact details, biographies, memberships, declared conflicts of interests, health data, diversity information),
- economic and financial data, · data related to location, logging, traffic and tracking and demographic data.

##### 5.1 PERSONAL DATA OF OUR MEMBERS OR FORMER EMPLOYEES

When Processing Personal Data relating to our members or former employees, acting as Data Controller, we will comply with Applicable Data Protection Laws (including where necessary any requirement to obtain consent from a Data Subject or the competent employee representative body – e.g. Works Council). In addition to this Policy, SQFT KS standard employment contracts, applicable policies and Member communications may specify the precise and detailed purposes for which SQFT KS may, from time to time, collect and Process Personal Data

The main purposes for Processing Personal Data (including Sensitive Personal Data) relating to Members may include the following:

- Payroll, Pension, Finance and Shares
- Commercial Administration and Management
- Employee Administration and Management
- Health, Safety, Law and Insurance
- Compliance with local legal requirements and agreed practices.

## 5.2 PERSONAL DATA OF OUR CLIENTS

When Processing Personal Data of our clients, we will act as a Data Processor, following duly documented instructions of the relevant clients for the following purposes:

**Management of governance, delivery and closing for client projects and services** including recruitment operations, training, suppliers and subcontractor management, billing, invoicing, reporting and audit activities;

**Management of client projects and services** such as

Document Management in Client Software

Commercial, Real estate, Residential, Office and retail Lease data abstraction and audit

On-boarding New Portfolio Data Migration and Implementation

Suite GLA, Year-end Outgoing reconciliation Management Fee Commission Set-Up - Audit and Budget Set-Up

Tracking of Customer Insurance

Communications, Customer chat support

Personal Data entry of Contacts, Creditor

Tracking of Contracts, Certificates & Permissions

Consolidation, record-keeping and management including audit like Comprehensive and New Portfolio Data health check

## 5.3 PERSONAL DATA RELATING TO OTHER DATA SUBJECTS

SQFT KS may also Process Personal Data relating to other Data Subjects (e.g. enquirers, website visitors, marketing/business contacts, prospective candidates, SQFT offices' visitors, etc.) for the purposes described below:

- Planning and administration
- Human Resources, recruitment
- Finance
- IT/Security
- Communication/Marketing
- Operations
- Legal

SQFT KS will usually act as a Data Controller in relation to such Processing operations and any third party engaged by SQFTKS or providing goods and/or services to SQFT KS will act as Processor.

## 6. WHY DO WE USE YOUR PERSONAL DATA

SQFT KS will Process Personal Data only when strictly necessary and apply further principles on the basis of whether SQFT KS acts as a Data Controller or as a Data Processor.

### 6.1 PRINCIPLES WHEN SQFT KS ACTS AS A DATA CONTROLLER

**Transparency, fairness and lawfulness:** SQFT KS will Process Personal Data lawfully, fairly and in a transparent manner in relation to the Data Subject, in accordance with the requirements of this Policy through the use of data privacy notices clearly setting out information necessary for compliance with the Applicable Data Protection Legislation.

**Defining a purpose:** any Processing of Personal Data by SQFT KS , particularly the collection thereof, will be preceded by the identification of the specific purpose for such Processing. Such purpose must be explicit and legitimate. Personal Data cannot be further Processed in a manner that is incompatible with such purpose.

**Data minimization:** once the purpose for Processing Personal Data has been established, SQFT KS will only collect Personal Data to the extent required for accomplishing such purpose. Each instance of Data Processing detail is to be reviewed as part of the early solution design phases and included in the Data Privacy and Security review and approval process or otherwise in order to ensure that the Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose for which it is Processed.

**Quality of Personal Data:** throughout the life cycle of any Personal Data Processing, SQFT KS will ensure that the collected Personal Data remains accurate and up to date. Every reasonable step will be taken to ensure that Personal Data that is inaccurate is erased or rectified without delay including but not limited to self-service options for Data Subjects. In particular, SQFT KS will provide adequate means for Data Subjects to inform SQFT KS in case of any change in their Personal Data.

**Data retention limitation:** SQFT KS will ensure that it does not keep your Personal Data for a longer period than strictly necessary to achieve the purpose for which your Personal Data is collected. Consequently, SQFT KS will determine before the performance of the Processing an appropriate retention period. In doing so, SQFT KS will consider the time during which the Personal Data is necessary to achieve the purpose of the Processing while taking into account the following factors:

- Period after which maintenance of such Personal Data may have an impact on Data Subjects' rights to be forgotten; and
- Any legal obligations imposing a minimum data retention period, as may be defined in the SQFT KS Records Retention Policy and Records Retention Schedule or otherwise.

**Defining a legal basis:** In addition to the above principles, any Processing may be performed only where it falls under one of the circumstances identified below:

- It is necessary to comply with a legal obligation applicable to SQFT KS (e.g., report data to tax authorities); or
- It is necessary for the execution of a contract (e.g. services agreement with a client); or
- It is necessary for the legitimate interest of SQFT KS , being understood that this legitimate interest of SQFT KS must be assessed against the interests of the Data Subjects:

- The Processing is necessary to achieve the interest pursued by SQFT KS without adversely impacting the Data Subject's interest and/or privacy;
- SQFT KS 's interest is not overridden by the fundamental rights or interests of the Data Subjects; and
- SQFT KS 's interest shall be determined in light of SQFT KS 's core business but shall comply with any Applicable Data Protection Legislation in a transparent manner;
- It is necessary to the vital interest of the Data Subject, or
- It is necessary for the performance of a task carried out in the public interest.

If none of the above legal basis apply, SQFT KS will seek and retain the Data Subjects' prior consent before Processing its Personal Data, being understood that Data Subject's consent is valid when (i) it is freely given by a clear affirmative act; and (ii) it represents a specific, informed and unambiguous indication of the Data Subject's agreement to the Processing of his/her Personal Data.

**Data Protection Impact Assessment (DPIA):** SQFT KS shall be responsible for monitoring Data Processing compliance with Applicable Data Protection Legislation. Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purpose of the processing, is likely to result in a high risk to the protection of your data, SQFT KS shall implement a data protection impact assessment procedure that shall enable SQFT KS to:

- identify which Processing presents any specific risk for the protection of Personal Data;
- assess the level of compliance with the Applicable Data Protection Legislation Processing principles
- assess the level of severity or likelihood of risk associated with the Processing; and
- determine the corrective measures to be implemented to ensure that Personal Data is Processed with risks that are mitigated and performed in compliance with the Applicable Data Protection Legislation. If, after mitigation, the risks to the Data Subjects remain significant and when required by Applicable Data Protection Legislation, the competent Data Protection Authority will be consulted prior to the start of the intended Processing.

Data Privacy Impact assessment document will be retained for the duration of Data Processing to which they apply.

## 6.2 PRINCIPLES WHEN SQFT KS ACTS AS A DATA CONTROLLER

SQFT KS will ensure that it Processes Personal Data solely in accordance with the documented instructions of the Data Controller.

In particular, such Processing shall be:

- For the Data Controller sole expressed purposes
- Made under the conditions agreed to between SQFT KS and the Data Controller
- For no longer than is expressly prescribed by the Data Controller; and
- According to the Data Controller's written instructions as set out in the Data Processing agreement entered into between SQFT KS and the Data Controller.

The Data Controller remains solely responsible for ensuring a valid legal basis for the Processing performed by SQFT KS and that the required Processing complies with Applicable Data Protection Legislation including the retention period to be applied. Nonetheless, SQFT KS will promptly inform the Data Controller if, in its opinion, an instruction of the latter infringes the Applicable Data Protection Legislation.



Unless otherwise instructed by the Data Controller, SQFT KS will apply (as a minimum) the same security baseline as it applies when it is acting as a Data Controller. Security measures which do not comply with the security baseline (as a minimum) will require the approval of SQFT KS Privacy and Security representatives.

SQFT KS will provide reasonable assistance to the Data Controller to support it in undertaking its obligations under Applicable Data Protection Legislation. The assistance to be provided by SQFT KS to Data Controller for compliance purposes in accordance with this section will be subject to the financial, technical and organizational conditions agreed between SQFT KS and Data Controller in the relevant agreement. Upon termination of the relevant Data Processing agreement, SQFT KS and any third party engaged by SQFT KS will either destroy or return all Personal Data to the client according to its instructions and Applicable Data Protection Legislation. In case of destruction, SQFT KS will certify to the Data Controller that such deletion took place. In case of a return, SQFT KS will ensure the confidentiality of the Personal Data transferred to the Data Controller by adhering to client's instructions.

For the avoidance of doubt, nothing in this Policy limits SQFT KS 's right to keep Personal Data for the purpose of existing litigation or to bring or defend future claims, in accordance with applicable legal statutes of limitation applicable to SQFT KS .

### **6.3 PRINCIPLES WHEN SQFT KS PROCESSES SENSITIVE PERSONAL DATA**

SQFT KS, when acting as a Data Controller, will Process Sensitive Personal Data if and only if it is strictly required.

In such case, SQFT KS shall ensure that at least one of the following conditions is met:

- The Data Subject has given his/her prior consent;
- The Processing is required for the purposes of carrying out the obligations and exercising specific rights of the Data Controller or of the Data Subject in the field of employment and social security and social protection law;
- If the Data Subject is not in a position to give his/her consent (e.g., for medical reasons), the Processing is necessary to protect the vital interests of the Data Subject or of another person;
- The Processing is required in the context of preventive medicine or medical diagnosis by a health professional under Local Legislation;
- The Data Subject has already manifestly placed the relevant Sensitive Personal Data in the public domain;
- The Processing is essential for the purpose of establishing, exercising or defending legal claims, provided that there are no grounds for assuming the Data Subject has an overriding legitimate interest in ensuring that such Sensitive Personal Data is not Processed; or
- The Processing is explicitly permitted by Local Legislation (e.g., registration/protection of minority groups).

Where SQFT KS, as a Data Processor, is required to Process Sensitive Personal Data, SQFT KS will follow the Data Controller's written instructions and apply the measures agreed to between parties, which shall be at least equivalent to the SQFT KS Security Baseline.

The Data Controller shall ensure a valid legal basis for the Processing performed by SQFT KS.

In any case SQFT KS will Process Sensitive Personal Data in accordance with Applicable Data Protection Legislation and comply with any mandatory specific hosting and Processing conditions.

#### **6.4 PRIVACY BY DESIGN/PRIVACY BY DEFAULT**

As demonstrated by the commitments made under this Policy, SQFT KS is committed to providing the appropriate level of protection for the Personal Data it processes. To ensure that the principles defined in this Policy are effectively considered when SQFT KS processes Personal Data, SQFT KS will identify and address any data protection constraints at the beginning of a new project so that the principles contained herein are reflected in the design of the project and appropriately implemented.

### **7. MANAGEMENT OF DATA INCIDENT AND BREACHES**

#### **7.1 INCIDENT MANAGEMENT**

SQFT KS has a mature, standards-based security incident response and management process designed to handle all phases of a security incident. Members' responsibilities are clearly defined at all levels. Incident assessment and prioritization standards are followed to ensure appropriate engagement levels and timely resolution. Incident records are maintained and reported to senior management as required. SQFT KS's Data Privacy team is immediately engaged in the incident management process whenever Personal Data is suspected to be involved.

#### **7.2 NOTIFICATION OF PERSONAL DATA BREACH**

Whether acting as a Data Controller or as a Data Processor, if SQFT KS reasonably believes that a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise Processed has occurred, SQFT KS will provide security incident notification and status updates to the relevant Data Protection Authority, to Data Subjects and/or to the Data Controller, in accordance with Applicable Data Protection Legislation or any other local applicable laws.

Similarly, and for the sake of clarity, in the event a Personal Data breach is identified by a third party engaged by SQFT KS, the third party will have to inform SQFT KS as agreed upon in the relevant agreement.

### **8. WHO DO WE SHARE YOUR PERSONAL DATA**

As part of SQFT KS operations, we may collect your Personal Data and disclose them to:

- SQFT KS Legal Entities since you can benefit from our full range of solutions and services as part of our global delivery model;

- third parties engaged by SQFT KS and providing goods to SQFT KS or performing services on our behalf (e.g. suppliers, subcontractors and freelancers);
- certain regulated professionals (e.g. banks, lawyers, notaries and auditors),

SQFT KS will disclose your Personal Data if the disclosure is reasonably necessary to protect SQFT KS 's rights and pursue available remedies, enforce SQFT KS 's terms and conditions, investigate fraud, or protect SQFT KS 's operations or users.

SQFT KS may also disclose your Personal Data to administrative, judicial or governmental authorities, state agencies or public bodies, strictly in accordance with Applicable Data Protection Legislation and Local Legislation, and after careful review, the legality of any order to disclose data. SQFT KS will challenge the order if there are grounds under the law of the country of destination to do so.

## **9. TRANSFER OF PERSONAL DATA**

Transfer of EU Personal Data shall refer to Personal Data of EU residents or Data Subjects located within the EU being Processed (e.g. accessed, sent, used, viewed, copied, deleted) in a third country outside the EEA

### **9.1 WITHIN SQFT KS**

SQFT KS acting as a Data Controller or Data Processor will Transfer EU Personal Data in accordance with the Applicable Data Protection Legislation and in accordance with SQFT KS s' Rules. This means that your rights as Data Subject remain the same no matter where your Personal Data is Processed.

When SQFT KS acts as Data Processor, prior specific or general consent is required in writing from the Data Controller before such transfer may be initiated.

Transfers of non-EU Personal Data shall take place in accordance with the Applicable Data Protection Legislation.

### **9.2 TO THIRD PARTIES**

Transfers of Personal Data to third parties shall take place in accordance with the Applicable Data Protection Legislation.

On a regular basis, SQFT KS conducts due diligence and third party privacy and security risks assessments with all third parties engaged by SQFT KS , to establish their corporate capabilities and maturity with respect to security and data protection.

Whenever SQFT KS relies on such third parties to process Personal Data, SQFT KS ensures that such third parties provide an adequate level of protection to the Personal Data they process as per Applicable Data Protection Legislation.

## 10. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

Data subjects have several rights under the Applicable Data Protection Legislation to request access to their Personal Data held by SQFT KS and/or information about how SQFT KS Processes their Personal Data. If you have any questions regarding the Processing of your Personal Data, please send your formal request to [mail@sqftks.com](mailto:mail@sqftks.com)

When acting as a Data Processor, upon request, SQFT KS will provide its clients with relevant information enabling such clients to comply with their own obligations toward Data Subjects. Unless otherwise indicated in any contractual agreement, SQFT KS shall not be required to inform Data Subjects directly thereof, as this remains the responsibility of the Data Controller.

As per Applicable Data Protection Legislation, where SQFT KS acts as the Data Controller, you have the following rights:

- to access to your Personal Data
- to rectify or delete any of your inaccurate or incomplete Personal Data
- to object on legitimate grounds to the Processing of your Personal Data at any time, unless such Processing is required by Applicable Data Protection Legislation or any Local Legislation
- to restrict the Processing of your Personal Data that is no longer accurate or necessary
- to receive your Personal Data in a structured, commonly used and machine-readable format
- to withdraw your consent given for the Processing of your Personal Data.

SQFT KS will act in accordance with the Applicable Data Protection Legislation and other relevant legal and contractual obligations in the search for and provision of relevant Personal Data. SQFT KS will require Data Processors that Process Personal Data to do the same. SQFT KS may need to ask you further questions in relation to your Personal Data or to verify your identity.

Upon termination of employment contracts for whatever reason, SQFT KS shall maintain the Personal Data of former employees for such time as shall be permissible in accordance with applicable laws and regulations and necessary for the provision of appropriate ongoing benefits and services (for example, Member share schemes and pension administration).

## 11. COMPLIANCE WITH THE POLICY

### 11.1 COMPLIANCE BY MEMBERS

Members acknowledge the requirements and annually confirm acceptance of this Policy. In addition to this Policy, Members must also comply with other applicable confidentiality and privacy obligations, including those set out in any Applicable Data Protection Legislation, their employment agreements and SQFT KS policies, processes and standards or client's instructions.

Members must follow any mandatory SQFT KS 's privacy training and awareness programs. These include, among other topics, mandatory web-based data privacy, information security, anti-corruption, and records management training, communication campaigns and specific trainings adapted to the different functions within the organization.

These trainings and awareness programs are regularly updated to reflect changes to the Applicable Data Protection Legislation.

SQFT KS maintains a dedicated privacy page on SQFT KS Intranet where policies, standards, guidance, information and other materials related to the global privacy program are made available to all Members

### **11.2 COMPLIANCE BY ANY THIRD PARTY ENGAGED BY SQFT KS**

In the event that any third-party Processes Personal Data on behalf of SQFT KS , such third party shall:

- ensure that its personnel accessing SQFT KS confidential information and Processing Personal Data on behalf of SQFT KS , complete all SQFT KS compliance mandatory trainings (including Security and Data Privacy awareness e-learnings) in the 30 days following the effective date of the agreement signed between SQFT KS and the third party;
- comply with this Policy and SQFT KS 's security policies and standards in addition to any other security controls included within contractual agreements between SQFT KS and its clients and/or partners. · process Personal Data in accordance with SQFT KS 's documented instructions and for no other purpose than the one expressly defined in writing by SQFT KS , unless it is required to do so under any mandatory law. In such case, the third party shall inform immediately SQFT KS of this legal obligation prior to processing.
- implement and maintain appropriate technical, organizational and contractual measures to ensure appropriate level of protection of Personal Data and to prevent any unauthorized or unlawful processing of Personal Data and any accidental loss, destruction or damage to Personal Data. These measures shall (i) take into account the highest standards and the risks posed by the Processing activities, (ii) be designed to implement the data protection principles in an effective manner and provide the Processing activities with the necessary safeguards in order to meet the requirements of the Applicable Data Protection Legislation.
- notify, to the extent permitted by law, SQFT KS of any request for disclosure of SQFT KS Personal Data that it receives from a third party, public authority or court, as well as of any action and/or measure regarding the processing of SQFT KS Personal Data that is under investigation by the authorities;
- comply with any request from SQFT KS for access, rectification, blocking, restoration, deletion and objection of SQFT KS Personal Data and ensure portability and the right to be forgotten of SQFT KS Personal Data;
- notify SQFT KS immediately of any changes that may affect the Processing of SQFT KS Personal Data;
- actively cooperate with SQFT KS to assess and document the compliance of SQFT KS 's Personal Data Processing, including providing SQFT KS with any information that SQFT KS may need or require to comply with Applicable Data Protection Legislation (including any information required for the Transfer Impact Assessment (TIA));
- immediately inform SQFT KS in writing if, in its opinion, any instruction from SQFT KS regarding the Processing of SQFT KS 's Personal Data constitutes a violation of the Applicable Data Protection Legislation.

### **12. RECORD OF PROCESSING ACTIVITIES**

SQFT KS maintains records of Processing activities carried out as a Data Controller or as Data Processor. SQFT KS will make sure that any new Processing of Personal Data is recorded in the Data Processing Inventory with relevant information regarding the context of each Processing of

Personal Data. SQFT KS shall make a record(s) of Processing available to the supervisory authority on request.

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