



Vrai Limited - Data Protection Policy

1. Introduction

Vrai ("we," "us," "our") is committed to protecting and respecting the privacy of individuals whose personal data we process. This Data Protection Policy outlines our approach to data protection, to ensure compliance with the General Data Protection Regulation (GDPR) and the UK's Data Protection Act 2018.

2. Scope

This policy applies to all employees, contractors, partners, and third parties who process personal data on behalf of Vrai. It covers all personal data processed by the organisation, regardless of format (electronic, paper, etc.).

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Processing:** Any operation or set of operations performed on personal data, whether automated or manual.
- **Data Subject:** An individual whose personal data is processed by Vrai.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes personal data on behalf of the Data Controller.

4. Data Protection Principles

Vrai adheres to the following principles when processing personal data:

1. **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
3. **Data Minimisation:** Vrai will ensure that personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.



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4. **Accuracy:** Personal data will be accurate and kept up to date. Inaccurate data will be corrected or deleted promptly.
5. **Storage Limitation:** Personal data will be retained only for as long as necessary for the purposes for which it is processed.
6. **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

5. Lawful Basis for Processing

Vrai will ensure that personal data is processed only when there is a lawful basis for doing so. The lawful bases include:

- **Consent:** The data subject has given clear consent for processing their personal data for a specific purpose.
- **Contractual Necessity:** Processing is necessary for the performance of a contract with the data subject.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation.
- **Legitimate Interests:** Processing is necessary for our legitimate interests, provided that these interests are not overridden by the rights and freedoms of the data subject.

6. Data Subject Rights

Data subjects have the following rights regarding their personal data:

1. **Right to Access:** The right to obtain confirmation as to whether or not personal data concerning them is being processed, and if so, access to the personal data.
2. **Right to Rectification:** The right to request the correction of inaccurate or incomplete personal data.
3. **Right to Erasure ("Right to be Forgotten"):** The right to request the deletion of personal data in certain circumstances.
4. **Right to Restriction of Processing:** The right to request the restriction of processing in specific situations.



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5. **Right to Data Portability:** The right to receive personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
6. **Right to Object:** The right to object to the processing of personal data based on legitimate interests or for direct marketing purposes.
7. **Rights Related to Automated Decision-Making:** The right to not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.

8. Data Security

Vrai implements appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encryption and pseudonymisation of personal data where appropriate.
- Regularly updating and testing our security measures.
- Restricting access to personal data to authorised personnel only.

9. Data Breach Management

In the event of a data breach, Vrai will promptly assess the risk to data subjects and, where appropriate, report the breach to the relevant supervisory authority within 72 hours. Data subjects will be informed if the breach is likely to result in a high risk to their rights and freedoms.

10. Data Transfers

Personal data will not be transferred to a country or territory outside the European Economic Area (EEA) unless adequate safeguards are in place to protect the data, in compliance with GDPR and the UK Data Protection Act 2018.

11. Data Processor Relationships

Vrai will only engage data processors who provide sufficient guarantees to implement appropriate technical and organisational measures in compliance with GDPR. Data processing agreements will be established with all processors, outlining their responsibilities and our expectations.



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12. Record Keeping

Vrai will maintain records of all processing activities, including the purposes of processing, data categories, data recipients, and retention periods. These records will be available to the supervisory authority upon request.

13. Training and Awareness

All employees and contractors involved in processing personal data will receive training on data protection principles and GDPR compliance. Regular updates will be provided to ensure ongoing awareness and understanding.

14. Policy Review and Updates

This policy will be reviewed regularly and updated as necessary to ensure ongoing compliance with data protection laws and best practices.

15. Contact Information

For questions or concerns regarding this Data Protection Policy or the processing of personal data, please contact:

Data Protection Officer (DPO)

Romona Harron-Harding

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07928461309

The Sitting Room, @ The Workhouse, Mill Street, Enniskillen, Co. Fermanagh, N Ireland. BT74 6NN

Vrai is committed to ensuring the privacy and protection of all personal data under our control.

This policy reflects our dedication to data protection and compliance with GDPR and the UK Data Protection Act 2018.