

# GlobalinkIT Data Privacy Framework

---

Effective Date: 17 February 2023

## 1. Purpose

The purpose of this Data Privacy Framework is to outline the principles and controls GlobalinkIT follows to ensure the protection and lawful processing of personal data in compliance with applicable privacy laws including GDPR, CCPA, and others.

## 2. Scope

This framework applies to all GlobalinkIT operations that process personal data of clients, employees, partners, and website users, regardless of geographical location.

## 3. Data Protection Principles

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

## 4. Data Subject Rights

GlobalinkIT ensures the rights of individuals are respected, including:

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object

## 5. Data Collection and Use

Personal data is collected only for legitimate business purposes. Clear consent is obtained where required, and data is not used beyond its intended purpose without proper notice.

## **6. Data Retention**

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected. After that, it is securely deleted or anonymized.

## **7. Data Security**

Appropriate technical and organizational measures are in place to protect personal data from unauthorized access, disclosure, alteration, or destruction.

## **8. Third-Party Processing**

Vendors and partners processing personal data on behalf of GlobalinkIT are required to comply with privacy standards through signed Data Processing Agreements (DPAs).

## **9. International Data Transfers**

Where data is transferred outside of the user's jurisdiction, appropriate safeguards such as Standard Contractual Clauses (SCCs) or equivalent legal mechanisms are employed.

## **10. Compliance and Review**

This framework is reviewed annually and updated as necessary to reflect changes in regulations, operations, or risk profiles. GlobalinkIT maintains records of processing activities and ensures continuous privacy training.