



Data Protection Policy

Introduction

This Policy sets out the obligations of **JAF DEMENAGEMENTS TUNISIA**, a company registered as number 014919P/M/M/000 .

Is defined “personal data” any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

- **All personal data must be:**

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- Processed in a manner which ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.
- The Company collects and processes the personal data including:

Personal data collected directly from data subjects; and Personal data obtained from third parties.

The Company only collects, processes, and holds personal data for the specific purposes of managing a relocation/storage file.

- **Adequate, Relevant, and Limited Data Processing**

The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) .

The Company shall not keep personal data for any longer than is for the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay

Personal data may be transmitted only over secure networks; transmission over unsecured networks is not permitted in any circumstances;

Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be permanently deleted. All temporary files associated therewith should also be deleted using double pass deletion;

All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked "confidential".

- **Data Security – Storage**

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

All electronic copies of personal data should be stored securely using passwords and secure data encryption;

All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

No personal data should be stored on any mobile device (including, but not limited to: laptop computers, tablets, and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of the company Directors and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary

No personal data should be transferred to any device personally belonging to any of the employees, agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy

It is the Company's policy that passwords can be used to protect personal data and that such passwords should be changed regularly and not use words or phrases which can be guessed easily or otherwise compromised;

Under no circumstances should any passwords be written down or shared among employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;

All software, including but not limited to, applications and operating systems shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related updates.

HOUCINE MOUMENE

GENERAL MANAGER

