



GENERAL DATA PROTECTION REGULATION (GDPR) POLICY STATEMENT

Toustone as an Australian based company is not subject to the requirements of the General Data Protection Regulation (GDPR) however Toustone recognises it as best practice and adhere to its principles in all instances where it does not violate the Australian Privacy Act (1988).

Toustone aims to preserve the confidentiality, integrity, and availability of personal data and related systems used by Toustone. This is achieved through the adoption of the 7 data protection principles and the 8 rights of data subjects according to the GDPR.

All employees of Toustone, inclusive of any Australian based third parties unless otherwise stated, must follow the General Data Protection Regulation (GDPR) principles when processing personal data.

These principles are:

- **Lawfulness, Fairness and Transparency**

Toustone must ensure that their data processing is lawful, fair, and transparent.

- a. Lawful – Ensure that Data Processing meets the criteria outlined in the GDPR e.g., the lawful basis for processing is one of the following: Consent; Contract; Legal Obligation; Vital Interest; Public Task; Legitimate Interest.
- b. Fair – Data Processing matches the description given to the Data Subject. Used only for the purposes and time period indicated.
- c. Transparent – Clearly informing the Data Subject about the nature of the Data Processing e.g., what you are going to do with it and who has access to it etc.

- **Purpose Limitation**

Any data processed about a Data Subject (whether directly or indirectly) must be done so for a legitimate, legal reason. We cannot state that we are processing data for one reason and then use it for another without first informing the Data Subject.

- **Data Minimisation**

We only collect the minimum amount of personal data required for the intended purpose.

- **Accuracy**

It is our responsibility to ensure that the personal data which we process is accurate and is kept up to date.

- **Storage Limitation**

Personal data may only be held by us for as long as the intended legitimate purpose requires it to be held. Afterwards this data should be deleted.

- **Integrity and Confidentiality**

At all stages of personal data processing, we will ensure that all personal data is held securely, using suitable, up to date security measures. For most modern data processing, this means that we will use suitable, up to date cyber security measures.

- **Accountability**

We are legally accountable for upholding the previous 6 principles and must be able to demonstrate compliance.

All employees of Toustone must not breach the individual rights of individuals in the use of their personal data. These rights are:

- The right to be informed.
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing.
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Failure to comply with the Toustone GDPR policy is a disciplinary offence that could ultimately lead to dismissal.