



# Ongoing Monitoring Policy

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Version 1.4

## Purpose

2COMS Group has established and enforces a structured approach for the ongoing monitoring of compliance with privacy laws and regulations. This policy ensures that 2COMS effectively manages privacy risks across the organization, thereby protecting personal data and maintaining the trust of our clients and stakeholders. Through this policy, 2COMS sustains a culture of accountability and transparency in all data protection practices.

## Scope

This policy applies to all employees, contractors, and third-party vendors who handle personal data and privacy-related activities within 2COMS Group. It covers all operations involving the collection, processing, storage, and sharing of personal information, including but not limited to:

- Employee data
- Client information
- Vendor details
- Any other personal data processed during business operations

## Policy Statement

2COMS Group fully complies with all applicable privacy laws and regulations. Recognizing that the landscape of data privacy constantly evolves, 2COMS actively monitors and manages privacy risks as an integral part of its operations. We ensure that personal data is always handled responsibly, ethically, and with the highest regard for legal and regulatory standards.

## Ongoing Monitoring Process

### 1. Vendor Management

Explanation: 2COMS ensures that all third-party vendors are fully committed to privacy laws and regulations, thereby aligning their data handling practices with our obligations and safeguarding personal data.

Implementation in Effect:

- Vendors are rigorously selected based on their proven reputation and verified commitment to data protection.
- Established vendors are periodically reviewed, and 2COMS ensures that they consistently uphold required standards related to data handling and privacy.

### 2. Risk Management Framework

Explanation: 2COMS operates a straightforward, effective framework to identify, manage, and mitigate privacy risks within the organization, guiding all decisions on data protection.

Implementation in Effect:

- Employees are continuously educated on potential privacy risks related to their roles, including the collection, processing, and storage of data.
- Strategies are already in place to address identified risks, including the deployment of additional security measures and revisions of data handling procedures where necessary.

### 3. Training and Awareness

Explanation: 2COMS sustains regular training programs that ensure employees remain well-informed about privacy laws, regulations, and best practices. This embeds a culture of compliance and empowers employees to actively uphold data protection standards.

#### Implementation in Effect:

- Training sessions are conducted during employee onboarding and at regular intervals.
- Training materials consistently cover key topics such as data privacy laws, the importance of data protection, and employees' responsibilities in safeguarding data.
- Employees are actively encouraged and supported to engage in discussions that strengthen their understanding of privacy practices.

## 4. Monitoring and Reporting

Explanation: 2COMS maintains a continuous monitoring program that rigorously evaluates compliance with privacy policies and regulations, ensuring proactive identification and resolution of improvement areas.

#### Implementation in Effect:

- A fixed schedule for internal reviews is established and followed, with defined frequency and scope.
- A robust reporting system is available, enabling employees to immediately report potential privacy issues or concerns via dedicated channels (including email and online tools).
- A formalized protocol is in place for responding to reported incidents, ensuring issues are promptly and effectively addressed.

## 5. Review and Update

Explanation: 2COMS ensures this policy remains effective and relevant through continuous review, aligning with changes in laws, regulations, and business practices. Continuous improvement is central to our privacy risk management.

#### Implementation in Effect:

- The policy is reviewed at least once annually by the designated privacy officer or compliance team.
- Input from employees, management, and external stakeholders is consistently solicited and incorporated.
- Updates to the policy are immediately communicated across the organization to ensure full alignment.

## Data Protection and Privacy Principles

2COMS Group consistently adheres to the following principles in all data protection and privacy practices:

- Lawfulness, Fairness, and Transparency: Personal data is processed legally, fairly, and transparently, with clear communication to individuals about data usage.
- Purpose Limitation: Personal data is strictly collected and processed for specific, legitimate purposes and never used for unrelated purposes.
- Data Minimization: Only the minimum necessary personal data is collected, strictly avoiding excessive collection.
- Accuracy: 2COMS actively maintains personal data accuracy and ensures all information is up to date.
- Storage Limitation: Personal data is retained only for as long as required for its intended purpose and is securely disposed of once no longer necessary.
- Integrity and Confidentiality: Personal data is consistently protected against unauthorized access, loss, or damage through rigorous technical and organizational measures.