



2COMS Privacy Program Training Policy

Effective Date: January 2, 2025

Policy Owner: 2COMS Group Compliance Department

1. Purpose

The purpose of this policy is to establish a comprehensive framework for privacy training at 2COMS. This training ensures that all employees and third-party partners are aware of their responsibilities regarding data protection and privacy. By fostering a culture of privacy awareness, 2COMS aims to enhance compliance with applicable laws and regulations, thereby protecting both the organization and the individuals whose data we handle.

2. Scope

This policy applies to all employees of 2COMS, including full-time, part-time, and temporary staff, as well as third-party vendors and partners involved in the collection, processing, or storage of personal data on behalf of 2COMS. All personnel must understand and adhere to this policy as part of their data handling responsibilities.

3. Training Objectives

- Awareness: Educate employees about the importance of data protection and privacy.
- Understanding Responsibilities: Ensure employees recognize their role in protecting personal information.
- Policy Familiarization: Provide knowledge of 2COMS's privacy policies and procedures.
- Culture of Privacy: Promote a workplace culture that prioritizes data privacy.

4. Training Framework

4.1 Training Content

- Introduction to Data Protection and Privacy principles.
- Detailed explanation of 2COMS Privacy Policies and procedures.
- Best practices for data handling, minimization, and secure storage.
- Incident Response and escalation within defined timelines (24–72 hours).

- Employee Responsibilities for vigilance and reporting privacy risks.

4.2 Training Delivery

- Formats: Online modules, in-person workshops, and expert seminars.
- Frequency: Initial training at onboarding and annual refreshers (bi-annual for high-risk departments).
- Assessment: Mandatory post-training tests with minimum passing criteria; certification issued on success.

5. Third-Party Training Requirements

- Vendors must provide training aligned with 2COMS's standards or complete 2COMS's program.
- Vendors must submit documentation (materials, attendance records) to 2COMS for review.
- Contracts will mandate compliance, and 2COMS reserves the right to audit vendor training programs.

6. Data Protection and Privacy Principles

- Lawfulness and Fairness: Personal data must be processed lawfully, fairly, and transparently.
- Purpose Limitation: Data may only be collected for specific, legitimate purposes.
- Data Minimization: Only necessary data should be collected.
- Accuracy: Ensure personal data is correct and updated regularly.
- Storage Limitation: Retain data only as long as required and dispose securely.
- Integrity and Confidentiality: Protect data against unauthorized access, ensuring security and confidentiality.

7. Responsibilities

Department Managers: Ensure completion of training, monitor compliance, and address gaps.

Employees: Actively participate in training, apply principles in daily activities, and report privacy concerns.

HR & Compliance: Enforce disciplinary measures for non-compliance, including warnings, retraining, or suspension.

8. Review and Updates

This policy will be reviewed annually to ensure effectiveness and relevance. Updates will be made to reflect changes in laws, organizational practices, and privacy trends. Continuous

improvement, including annual incident drills, will ensure adaptability to the evolving data protection landscape.