



POLICY DOCUMENT

b2wise Privacy Policy

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Purpose

In an era where personal data has become the cornerstone of digital interactions and business operations, B2wise places the utmost importance on privacy and data protection. This Privacy Policy is a testament to our unwavering commitment to safeguarding personal data, not only as a legal obligation but as a core aspect of our ethical responsibility to individuals whose data we handle. By adhering to the principles of the General Data Protection Regulation (GDPR) alongside other relevant privacy laws and regulations, we aim to set a high standard for data protection and privacy practices across all facets of our business.

The principles laid out in this policy reflect our dedication to transparency in our data processing activities. We believe that individuals should have clear, concise, and accessible information about how and why their data is used, ensuring that they can make informed decisions regarding their personal information. This commitment extends beyond compliance, embedding privacy into the fabric of our operational processes and the design of our products and services.

Accountability is another cornerstone of our approach to privacy. We take full responsibility for the personal data under our stewardship, ensuring that it is treated with the highest level of care throughout its lifecycle. This includes implementing and maintaining robust data protection measures, conducting regular privacy impact assessments, and fostering a culture of privacy awareness within our organization.

Our policy also outlines our practices regarding the collection, use, storage, and sharing of personal data, providing clear guidelines to ensure the protection of personal information within our organization and in relation to our website interactions. By articulating these practices, we aim to build and maintain trust with our customers, employees, and partners, demonstrating our commitment to not only meet but exceed the standards set forth by GDPR and other applicable privacy laws.

In summary, the purpose of this Privacy Policy is to:

- Reinforce our commitment to protecting personal data in a manner that respects individual privacy rights and adheres to international best practices.
- Ensure transparency and provide individuals with clear information about our data processing activities and their rights concerning their personal data.
- Promote accountability within our organization, ensuring that privacy and data protection are integral to our business operations.
- Establish trust with all stakeholders by demonstrating a principled approach to privacy and data protection.

Through this policy, B2wise seeks to affirm its role as a trusted guardian of personal data, committed to upholding the privacy rights of individuals and fostering an environment of transparency and accountability in all our data processing activities.

Scope

The scope of this Privacy Policy is designed to encompass every aspect of B2wise's interactions involving personal data, ensuring comprehensive protection that aligns with our commitment to privacy and data security. This policy applies universally to all processes, departments, and engagements where personal data is involved, underscoring our dedication to upholding the highest standards of privacy across our entire operational spectrum.

Data Collection Channels:

This policy governs the handling of personal data collected through various channels, including but not limited to, our official website, electronic communications such as email, social media interactions, direct communications, customer service engagements, and through the use of our products or services. Whether data is collected directly from the data subject or obtained from third parties, it falls under the purview of this policy.

Types of Data:

We recognize that our business operations involve diverse interactions, leading to the processing of various types of personal data. This includes, but is not limited to, basic identification information (such as names, addresses, and contact details), financial and transactional data, employment details for our employees, technical data generated from the use of our website (such as IP addresses, cookie data, and usage statistics), and any other information that can be considered personal under applicable laws.

Stakeholders:

The policy is inclusive of all individuals whose personal data we might process. This includes:

- **Employees:** Current, prospective, and former employees, contractors, and temporary staff.
- **Customers:** Individuals who use or inquire about our products or services.
- **Business Partners:** Suppliers, affiliates, resellers, and other partners involved in our supply chain and business operations.
- **Visitors:** Individuals who visit our website or premises, participate in our surveys, contests, or promotional offers.

Geographic Reach:

While B2wise operates globally, we are committed to complying with local privacy laws and regulations in every region we operate. This policy is designed to meet not only the stringent requirements of the GDPR but also to align with other international and national data protection laws, ensuring a consistent and high level of privacy protection worldwide.

Digital and physical data management:

Our commitment extends to both digital and physical formats of personal data. Whether personal data is stored on our digital servers, cloud systems, or in physical files, the principles and protections outlined in this policy apply equally, ensuring comprehensive data security and privacy.

Third-Party Data Processors:

Recognizing that our business operations might involve third-party service providers who process personal data on our behalf, this policy also extends to such arrangements. We ensure that all third-party processors adhere to the same standards of data protection as B2wise, through rigorous contractual agreements and regular audits.

Roles & Responsibilities

Administrative Staff

- **Description:** Administrative staff are involved in the day-to-day operations that include collecting, handling, or capturing personal information of employees, customers, or other individuals.
- **Responsibilities:**
 - Ensure the confidentiality, integrity, and availability of personal data they process.
 - Adhere to all data protection policies and procedures.
 - Report any suspected data breaches or security incidents to the Data Protection Officer immediately.
- **Accountability:**
 - Administrative staff are accountable for their actions regarding personal data and may face disciplinary action in cases of non-compliance with the organization's data protection policies.

Information Officer

- **Description:** The Information Officer oversees the processing of personal information requests, acting as a bridge between the organization and individuals wishing to exercise their privacy rights.
- **Responsibilities:**
 - Facilitate requests for access to, amendment of, and deletion of personal information.
 - Serve as the primary contact for privacy-related inquiries from both within the organization and from the public.
 - Ensure transparency in the processing of personal data and assist in the communication of privacy practices.
- **Accountability:**
 - The Information Officer is responsible for ensuring that requests for information are handled in accordance with legal requirements and organizational policies.

External Service Providers

- **Description:** Third-party vendors or contractors that perform services or functions on behalf of B2wise, involving access to or processing of personal data.
- **Responsibilities:**
 - Process personal data solely for the purposes specified in contractual agreements.
 - Implement and maintain security measures to protect personal data in line with B2wise's standards.
 - Report any data breaches or security incidents affecting B2wise's data to the organization promptly.
- **Accountability:**

- External service providers are legally and contractually accountable for adhering to agreed data protection standards, with penalties for non-compliance outlined in service agreements.

Data Protection Officer (DPO)

- **Description:** The DPO oversees the organization's data protection strategy and its implementation to ensure compliance with GDPR and other data protection laws.
- **Responsibilities:**
 - Monitor compliance with data protection laws, including managing internal data protection activities, training staff, and conducting internal audits.
 - Provide advice regarding the impact of data protection efforts.
 - Serve as the point of contact for supervisory authorities for all data protection issues.
- **Accountability:**
 - Craig Douglas, as the appointed Information Officer and acting DPO, is responsible for the overall data protection governance within B2wise, ensuring that the organization's data processing activities comply with legal standards.

Policy Details

Collection, Use, and Disclosure of Personal Information

Lawful Basis for Processing: At B2wise, every processing activity of personal data is underpinned by a lawful basis, ensuring the legitimacy of our actions in accordance with GDPR and other applicable privacy regulations. Our operations are guided by the following lawful bases:

- **Contractual Necessity:** Processing activities necessary for the execution or performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract.
- **Compliance with Legal Obligations:** Activities where processing of personal data is required for compliance with a legal obligation to which B2wise is subject.
- **Consent:** Instances where the data subject has given clear consent for processing their personal data for one or more specific purposes. This consent is freely given, specific, informed, and unambiguous, with mechanisms in place for data subjects to withdraw consent at any time.
- **Legitimate Interests:** Processing is necessary for the purposes of the legitimate interests pursued by B2wise or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Purpose Limitation: We are committed to processing personal data for specific, explicit, and legitimate purposes only. This commitment ensures that:

- Data subjects are fully aware of the reasons their data is being processed, enhancing transparency and trust.
- Data is not processed in a way that is unrelated or incompatible with the original purpose for which it was collected, without obtaining further consent from the data subject.

Data Minimization: Adhering strictly to the principle of data minimization, B2wise ensures that:

- Only the personal data that is necessary for the clearly stated purposes is collected, without superfluous data collection.
- Assessments are regularly conducted to ensure that the personal data we process is not excessive for the intended purpose and is kept to the strict minimum.

Further Considerations:

- **Data Accuracy:** We take every reasonable step to ensure personal data is accurate, up-to-date, and corrected or deleted without undue delay when inaccuracies are identified.
- **Storage Limitation:** Personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Special attention is given to the risks, nature, and purpose of the information, implementing appropriate timelines or criteria used to determine the retention period.
- **Integrity and Confidentiality:** Processing is done in a manner that 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.
- **Transparency:** Data subjects are provided with information about the processing of their personal data in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

Review and Update of Data Protection Practices: B2wise regularly reviews and updates its data protection practices ensuring ongoing compliance with GDPR and other relevant legislation, adapting to changes in technology, business practices, and legal requirements.

Data Security

Security Measures: In the digital age, the security of personal data is paramount. B2wise employs a multifaceted approach to data security, incorporating a blend of advanced technology, stringent organizational protocols, and continuous staff training to safeguard personal data against any form of unauthorized access or malicious breach. Our security framework includes but is not limited to:

- **Network and Application Security:** Use of firewalls, intrusion detection systems, and regular security assessments to prevent unauthorized access to our networks and systems.
- **Access Control:** Implementation of strict access controls and authentication mechanisms to ensure that only authorized personnel have access to personal data, based on their role and the necessity of the data for their work.
- **Data Encryption:** Utilization of strong encryption protocols for data in transit and at rest, protecting data from unauthorized interception and access.
- **Regular Audits and Monitoring:** Conducting regular audits of our security measures and monitoring systems for potential vulnerabilities to ensure they are always up-to-date and effective.

Encryption and Anonymization: B2wise adopts a proactive approach to minimize risks to personal data:

- **Encryption:** Applying state-of-the-art encryption standards to secure sensitive personal data, ensuring that in the event of a data breach, the information remains incomprehensible and secure.
- **Anonymization and Pseudonymization:** Wherever possible, personal data is anonymized or pseudonymized, significantly reducing privacy risks by transforming the data in such a way that the data subject is not or no longer identifiable.

Data Quality

Accuracy: Recognizing the importance of accurate data not just for compliance but for the efficiency and effectiveness of our services, B2wise implements rigorous data management practices:

- **Regular Reviews:** Conducting periodic reviews and audits of the data we hold to identify and correct inaccuracies.
- **Engagement with Data Subjects:** Facilitating and encouraging data subjects to update their personal data regularly and providing easy-to-use mechanisms for them to request corrections or updates.

Openness and Transparency

Privacy Notices: B2wise is committed to transparency as a means to build trust and empower individuals concerning their personal data. Our privacy notices are designed to be:

- **Clear and Accessible:** Written in plain language and easily accessible, ensuring that all individuals can understand how their personal data is being used.
- **Comprehensive:** Detailing not just the purpose and lawful basis for processing, but also explaining data subject rights, data retention periods, and how individuals can exercise their rights or lodge complaints.
- **Dynamic:** Regularly reviewed and updated to reflect changes in processing activities or legal requirements, ensuring ongoing compliance and relevance.

Engagement and Communication: Beyond privacy notices, we actively engage with stakeholders through various channels to communicate any significant changes to our data processing activities or policies, reinforcing our commitment to openness and transparency.

Access and Correction

Rights of Data Subjects: B2wise acknowledges and prioritizes the rights of individuals under GDPR and other applicable privacy regulations. Our approach is designed to empower individuals by facilitating their rights in a transparent, accessible, and efficient manner:

- **Right to Access:** Individuals can request access to their personal data held by B2wise to understand how and why their data is processed, including receiving copies of their personal data.
- **Right to Rectification:** We encourage individuals to inform us of any changes or inaccuracies in their personal data. B2wise commits to promptly rectifying any inaccuracies in personal data to ensure it remains accurate and up to date.
- **Right to Erasure ("Right to be Forgotten"):** Individuals can request the deletion of their personal data when it is no longer necessary for the purposes it was collected, among other conditions.
- **Right to Restrict Processing:** In certain conditions, individuals have the right to request the restriction of processing of their personal data, such as during the verification of the accuracy of the data or the assessment of an objection to processing.
- **Right to Object:** Individuals have the right to object to certain types of processing, including direct marketing and processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority.

- **Right to Data Portability:** Individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller.

Implementing Requests: B2wise has established clear procedures for responding to requests from data subjects, ensuring timely and appropriate action. We provide mechanisms for individuals to submit requests electronically or in writing, with support available to guide them through the process.

Personal Information Retention

Retention Policies: The retention of personal data at B2wise is guided by principles that balance legal requirements, operational necessities, and the rights of individuals:

- **Established Periods:** Retention periods for personal data are determined based on legal obligations, the purpose for which the data was collected, and the necessity to keep the data for legitimate business or operational reasons.
- **Review and Evaluation:** We regularly review our data retention policies to ensure they remain aligned with legal requirements and our operational needs. This includes assessing the continued relevance and necessity of retaining personal data.
- **Secure Disposal:** When personal data is no longer required to be retained, it is securely disposed of or anonymized. Secure disposal methods are employed to prevent any potential misuse of personal data post-disposal, including shredding of physical records and secure deletion of digital data.

Transparency and Communication: Our retention policies are communicated transparently to data subjects, informing them of how long their data will be kept and the rationale for its retention. This information is included in our privacy notices and is available upon request, ensuring individuals are aware of their rights and our practices regarding the retention of their personal data.

Trans-Border Data Flows

GDPR Compliance for Transfers: Recognizing the global nature of our operations, B2wise is committed to ensuring the secure and lawful transfer of personal data across borders. Our approach includes:

- **Adequacy Decisions:** Leveraging data transfer mechanisms to countries that have been deemed by the European Commission to provide an adequate level of data protection.
- **Standard Contractual Clauses (SCCs):** Where transfers are made to countries without adequacy decisions, B2wise employs SCCs, ensuring contractual obligations meet GDPR standards for data protection.
- **Binding Corporate Rules (BCRs):** For intra-organizational transfers across borders, B2wise may use BCRs, approved by relevant data protection authorities, to provide a consistent level of protection for personal data within the organization worldwide.

Assessment and Documentation: Prior to any trans-border data flow, B2wise conducts thorough assessments to ensure the receiving country or entity provides an adequate level of protection. Documentation of these assessments and measures is maintained for accountability and compliance purposes.

Special Categories of Personal Data

Sensitive Data Processing: B2wise exercises heightened diligence and care when processing special categories of personal data, recognizing its sensitivity. This includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, or data concerning a person's sex life or sexual orientation.

- **Explicit Consent:** Processing of sensitive data is generally predicated on obtaining explicit consent from the data subject, ensuring they are fully informed of the specific nature of the processing and the protection measures in place.
- **Legal Requirements:** In cases where processing is necessary for reasons of substantial public interest, on the basis of EU or member state law, B2wise ensures that such processing complies with the law's provisions and respects the essence of the right to data protection.

Automated Decision-Making and Profiling

Safeguards and Rights: In alignment with GDPR, B2wise adopts a transparent and responsible approach to automated decision-making and profiling:

- **Transparency:** Data subjects are informed when their data is subject to automated decision-making, including profiling, detailing the logic involved, the significance, and the envisaged consequences of such processing.
- **Human Intervention:** B2wise ensures mechanisms for human intervention in automated decisions, allowing data subjects to express their point of view and contest the decision.
- **Accuracy and Security:** Measures are in place to secure data and ensure the accuracy of data used in automated decision-making and profiling, minimizing the risk of errors and bias.

Rights of Data Subjects: Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, except where explicitly authorized by law or based on the individual's explicit consent.

Recording of Online EXTERNAL Meetings

In compliance with the General Data Protection Regulation (GDPR), b2wise adopts stringent measures regarding the recording of **EXTERNAL** online meetings. The following guidelines are established to ensure transparency and consent during such recordings:

Purpose and Limitation:

- **Purpose:** The purpose of recording will be communicated to participants before obtaining their consent. Recordings will only be used for the stated purposes, such as meeting minutes, training, or quality assurance, and will not be repurposed without additional consent.

Consent for Recording:

- **Consent:** Prior to recording any **EXTERNAL** online meeting, participants will be informed of the recording. Participants have the option to decline participation if they do not consent to being recorded.

Access and Transparency:

- **Access:** Access to recordings will be strictly limited to individuals who require it for legitimate business purposes and will be controlled through secure storage mechanisms.

Point of Contact: For any questions or concerns regarding the policy on the recording of online **EXTERNAL** meetings, please contact Craig Douglas HR and Compliance Manager, at HRandCompliance@b2wise.com

Compliance and Enforcement

GDPR Compliance Framework:

Understanding the importance of GDPR compliance in protecting individuals' privacy rights, B2wise has implemented a robust framework to ensure ongoing adherence to these regulations:

- **Data Protection Impact Assessments (DPIAs):** We conduct DPIAs for processing activities that pose a high risk to individuals' rights and freedoms, facilitating the identification and minimization of data protection risks.
- **Regular Audits:** To ensure continuous compliance with GDPR, B2wise undertakes regular audits of its data processing activities and practices. These audits are conducted both internally and by third-party experts, ensuring an unbiased evaluation of our data protection measures.
- **Staff Training:** Recognizing that informed employees are the first line of defence in data protection, B2wise provides comprehensive training on data protection principles, GDPR requirements, and specific roles and responsibilities. Training programs are updated regularly to reflect changes in legislation and best practices.
- **Policy and Procedure Updates:** Our data protection policies and procedures are regularly reviewed and updated to ensure they remain effective and in line with current GDPR requirements and best practices in data protection.

Data Breach Response:

- **Documented Process:** B2wise has developed a formalized process for responding to data breaches. This process outlines steps for promptly assessing and managing breaches to mitigate potential harm to individuals and comply with legal obligations.
- **Notification Procedures:** In the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, B2wise will notify the relevant supervisory authority without undue delay and, where feasible, within 72 hours after becoming aware of the breach. When the breach poses a high risk to individuals' rights and freedoms, affected individuals will also be notified directly, providing them with information about the nature of the breach, the likely consequences, and the measures taken or proposed to address the breach.
- **Breach Record Keeping:** All data breaches, regardless of their size or impact, are recorded in an internal register. This register helps in evaluating the causes of breaches, the effectiveness of response strategies, and in demonstrating compliance with GDPR's accountability principle.

Compliance and Accountability Measures:

- **Data Protection Officer (DPO):** B2wise has appointed a Data Protection Officer responsible for overseeing data protection strategies, compliance, and acting as a point of contact for supervisory authorities and individuals regarding data protection matters.
- **Partners and Third-Party Vendors:** We extend our data protection obligations to our partners and third-party vendors, requiring them to adhere to GDPR standards through contractual agreements and conducting regular assessments of their compliance.

Through this enhanced focus on compliance and enforcement, B2wise solidifies its position as a privacy-conscious organization, not only by meeting the legal requirements set forth by GDPR but also by embedding privacy and data protection into the fabric of its operational ethos, thereby ensuring the highest level of protection for personal data under its care.

Policy Review and Updates

Commitment to Continuous Improvement:

B2wise recognizes that data protection is a dynamic field, influenced by changes in technology, legal frameworks, and societal expectations. In acknowledgment of this, our privacy policy is not static but a living document that reflects our ongoing commitment to privacy and data protection excellence. This commitment entails:

- **Regular Reviews:** We conduct regular reviews of our privacy policy at least annually or more frequently in response to significant changes in our processing activities, technological developments, or amendments to data protection laws and regulations. These reviews ensure that our policy remains aligned with the latest legal requirements and best practices in data protection.
- **Stakeholder Engagement:** Understanding that effective privacy practices benefit from diverse perspectives, B2wise engages with various stakeholders, including data subjects, employees, partners, and regulators, to gather feedback and insights that inform policy updates.
- **Technological Advancements:** As new technologies emerge, B2wise evaluates their impact on privacy and data protection, incorporating necessary adjustments into our policy to address any new risks or opportunities these technologies may present.
- **Adaptation to Legal Changes:** The legal landscape of data protection continues to evolve both within the European Union and globally. B2wise closely monitors these developments, ensuring our policy reflects current legal requirements, including GDPR and other relevant privacy regulations.

Process for Updates:

- **Documentation and Approval:** Any updates to the privacy policy undergo a thorough documentation process, including detailing the reasons for changes, the specific updates made, and the implications for data processing practices. Updates are reviewed and approved by our Data Protection Officer (DPO) and senior management to ensure they meet our standards for data protection and compliance.
- **Communication of Updates:** Transparency is a cornerstone of our privacy practices. When significant updates are made to the policy, B2wise communicates these changes to all affected parties, including employees, customers, and partners, through direct communication channels and updates on our website. This ensures that all stakeholders are aware of how their personal data is managed and protected.
- **Accessibility and Archiving:** The latest version of our privacy policy is always accessible on our website, providing clear and easy access for individuals wishing to understand our data protection practices. Previous versions of the policy are archived, maintaining a record of our privacy policy's evolution and demonstrating our commitment to continuous improvement in data protection.

This enhanced approach to policy review and updates demonstrates B2wise's proactive and transparent stance on data protection, ensuring that our practices not only comply with current regulations but also anticipate and adapt to future challenges and opportunities in privacy and data security.

Questions and Support

Accessible and Responsive Support:

B2wise is dedicated to providing a supportive and responsive environment for addressing any questions, concerns, or requests related to our privacy practices and the personal data we process. Recognizing the importance of clear communication and easy access to information, we offer several avenues for individuals to reach out for support:

- **Data Protection Officer (DPO):** Our Data Protection Officer serves as the primary point of contact for all matters related to privacy and data protection. Whether you have questions about how we process your data, wish to exercise your rights under GDPR or other privacy laws, or have any concerns or feedback about our privacy practices, our DPO is here to assist you.

Exercising Your Rights:

B2wise respects and facilitates the rights of data subjects under GDPR and other applicable privacy laws. If you wish to access your personal data, request rectification or erasure, object to processing, or exercise any other rights, our team is ready to guide you through the process and provide the necessary support. Instructions and assistance for submitting requests can be obtained from the DPO.

Feedback and Complaints:

- **Feedback:** We value your feedback on our privacy practices as it helps us improve and strengthen our data protection measures. Feedback can be directed to our DPO, who will ensure it is considered and addressed appropriately.
- **Complaints:** If you have any complaints regarding our processing of your personal data or our privacy practices, we encourage you to contact our DPO. We are committed to resolving any issues in a fair and timely manner. Furthermore, you have the right to lodge a complaint with a supervisory authority, and our DPO can provide you with information on how to do so.

Educational Resources and Support:

- **Privacy Education:** B2wise offers resources and support for individuals to understand their privacy rights and our data processing activities better. This includes informational materials available on our website and direct support from our DPO for any specific inquiries.
- **Updates and Announcements:** Stay informed about any changes to our privacy practices by visiting our website or subscribing to our updates. Our DPO also disseminates important announcements related to data protection and privacy.

Incident Reporting

Purpose and Importance:

B2wise is committed to maintaining the highest standards of data privacy and security. Recognizing that the early detection and reporting of privacy incidents or policy violations are critical to protecting personal data, B2wise has established a structured incident reporting mechanism. This process is designed to:

- Ensure prompt and effective handling of privacy incidents or breaches.
- Encourage a proactive approach to identifying and mitigating potential privacy risks.

- Foster an environment where employees feel empowered to report incidents without fear of retribution.

Who Should Report:

- **All Employees and Contractors:** Everyone within the B2wise organization is responsible for reporting any suspected or actual incidents of data privacy violations, unauthorized data access, or breaches.
- **External Stakeholders:** Customers, partners, and other external parties are also encouraged to report any privacy concerns or suggestions for improving B2wise's privacy practices.

How to Report:

- **Primary Contact - Your Line Manager:** Your first point of contact for reporting any privacy incident or concern is your line manager. They are equipped to assess the situation and escalate it to the appropriate channels.
- **Data Protection Officer (DPO):** For situations that may require confidentiality or involve complex privacy issues, reports can be directed to the Data Protection Officer (DPO). The DPO is responsible for ensuring the comprehensive investigation and resolution of reported incidents. Contact details for the DPO should be easily accessible within the organization.
Contact Information: DPO Contact Information - Craig Douglas – craig.douglas@b2wise.com
- **Anonymous Reporting Channels:** Recognizing that some individuals may prefer to report anonymously, B2wise provides an anonymous reporting channel, such as a dedicated hotline or online platform, ensuring confidentiality and protection for the reporter.

What to Report:

- Any suspected or actual unauthorized access, disclosure, alteration, or destruction of personal data.
- Violations of B2wise's privacy policy or data protection laws.
- Any attempt, whether successful or not, to gain unauthorized access to personal data.
- Suggestions for improvements in data privacy and security practices.

Response and Follow-Up:

- Upon receiving a report, B2wise commits to promptly assessing the situation, determining the appropriate response, and taking necessary actions to address the incident.
- The reporter, where possible and appropriate, will be kept informed of the progress and outcomes of the investigation, respecting confidentiality and legal constraints.
- Lessons learned from incidents are incorporated into B2wise's privacy and security training, and, where necessary, policies and practices are adjusted to prevent future occurrences.

Consequences of non-compliance

Overview:

Non-compliance with B2wise's privacy policy and data protection laws, such as the GDPR, can have severe implications for both the organization and individual employees involved in violations. B2wise

is committed to upholding the highest standards of data privacy and expects all employees, contractors, and third-party service providers to adhere strictly to these standards.

For the Organization:

- **Legal and Financial Penalties:** B2wise may face substantial fines and penalties for breaches of data protection laws. Under GDPR, for instance, fines can reach up to €20 million or 4% of the annual global turnover of the preceding financial year, whichever is higher.
- **Reputational Damage:** Violations can lead to significant damage to B2wise's reputation, potentially resulting in loss of customer trust, negative publicity, and a decline in business.
- **Operational Disruptions:** Non-compliance may lead to legal actions, investigations by regulatory authorities, and possibly, operational restrictions, affecting the organization's ability to conduct business.

For Individuals (Employees, Contractors):

- **Disciplinary Actions:** Employees found to have intentionally violated the privacy policy may face disciplinary actions, including termination of employment, depending on the severity of the violation.
- **Personal Liability:** Individuals may be held personally liable for actions that result in non-compliance. This can include personal fines and, in severe cases, criminal charges that could lead to jail terms.
- **Professional Repercussions:** Beyond immediate legal or disciplinary actions, individuals involved in violations may suffer long-term professional repercussions, including damage to their reputation and future employment prospects.

Preventative Measures and Education:

- To prevent non-compliance, B2wise invests in ongoing education and training for all personnel on data protection laws, the organization's privacy policy, and the importance of adherence to these guidelines.
- Regular audits and compliance checks are conducted to ensure that all areas of the organization understand and comply with data protection requirements.

Reporting and Transparency:

- B2wise encourages a culture of transparency and accountability. Employees are urged to report any suspected non-compliance or data protection issues through established channels without fear of retaliation.
- The organization commits to investigating all reports thoroughly and taking appropriate action to address and rectify any issues of non-compliance.

Glossary of Terms

<i>Terms used</i>	<i>Definition</i>
Access	This involves an organisation giving individual information about themselves held by the organisation. Giving access may include allowing an individual to inspect personal information or giving a copy of it to them.

<i>Terms used</i>	<i>Definition</i>
Collection	An organisation collects personal information if it gathers, acquires, or obtains personal information from any source and by any means. Collection includes when an organisation keeps personal information it has come across by accident or has not asked for.
Consent	Consent means voluntary agreement to some act, practice, or purpose. It has two elements: knowledge of the matter agreed to, and voluntary agreement. Consent can be express or implied. Express consent is given explicitly, either orally or in writing. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the organisation. Consent is invalid if there is extreme pressure or coercion.
Disclosure	In general terms an organisation discloses personal information when it releases information to others outside the organisation. It does not include giving individuals' information about themselves (this is 'access' see above).
Data Subject	The person or persons about whom personal information is collected, stored, or processed.
External	Third parties such as individuals, customers and organisations who are not part of the b2wise entity.
Use	In general terms, use of personal information refers to the handling of personal information within an organisation including 'the inclusion of information in a publication'.