

medine

**MEDINE LIMITED
PRIVACY CHARTER**

MEDINE LIMITED PRIVACY CHARTER

INTRODUCTION

As companies evolve towards a digital business model and grows more interconnected, exponentially more data, including our own personal data, is proliferated and shared among organisations and clients. This digital information has become the lifeblood of the interconnected business ecosystem and is increasingly valuable to organisations. It is extremely important to set the right direction to protect the fundamental rights of individual and clients. In addition, we also have regulatory obligations to uphold, through our compliance safeguards the reputation and profitability of our business.

Founded in 1911 as The Medine Sugar Estates Company Limited and rebranded Medine Limited in 2009, the company's history is inherently linked to the history of Mauritius. As a major player in the sugar and cane industry of the island for more than a century, Medine* has known how to get away from a monocrop agriculture, specially based on sugar cane, to become a diversified group with four pillars of activity, namely Agriculture, Education, Leisure and Property. Medine is now an umbrella to six businesses namely, Agriculture, Property, Education, Concorde, Tamarina and Casela.

To maintain its integrated sustainable development, Medine needs to make sure that the personal data of clients and employees are handled appropriately. With the Data Protection Act 2017 ("DPA") and the European Union's General Data Protection Regulation (the "GDPR"), Medine has greater regulatory obligations to protect the data subjects' personal data.

This Privacy Charter sets the tone on the commitment Medine has taken towards its data subjects (including employees, clients, and other stakeholders like business partners, third parties, service providers, tour operators amongst others) regarding the protection of their personal data. This document defines the privacy framework and principles, privacy statement and supporting privacy policies to be adopted by Medine. It governs and supports the business activities of Medine in the way personal information is collected, processed, stored and archived while managing the day to day business.

The privacy framework defines how Medine will comply with DPA and EU GDPR and manage the controls effectively on an ongoing basis. The Medine privacy principles are the rules that guide Medine's efforts to handle and protect personal data.

Privacy policies translate legal requirements and regulations into company specific guidelines for the business processes related to collection, use, and disclosure of personal data. The privacy policies include a general description of security and privacy measures and where required, it includes documentation of the rights afforded to data subjects and the existence of consent mechanisms.

Any exception to the Privacy charter must have a written approval from the Medine Data Protection Officer ("DPO") with proper business justification, risks acceptance, and compensatory controls. The Data Protection Steering Committee ("The Steering Committee") will review any exceptions identified through risk assessments in consultation with the legal advisor to authorise an exception.

* Medine refers to Medine Limited and its subsidiaries.

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1. SCOPE

(a) Medine Business Entities

This Privacy Charter applies to Medine which inter-alia encompasses the below listed business entities.

- (I) Medine Limited, the holding company with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (II) Medine Limited | Shared Services with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (III) Medine Limited | Property with business address at 5, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (IV) Medine Limited | Agriculture with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (V) Medine Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius, trading under the name of Yemen Experience.
- (VI) Casela Limited with business address at Royal Road, Cascavelle.
- (VII) Casela Limited with business address at Royal Road, Cascavelle, trading under the name of SPARC.
- (VIII) Cascavelle Shopping Mall Limited with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (IX) Uniciti Education Hub Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (X) Concorde Tourist Guide Agency Limited as Concorde with business address at Royal Road Swami Sivananda, Floreal.
- (XI) Tamarina Beach Club Hotel Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (XII) Tamarina Golf Club Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (XIII) Akuo Energy Solutions (Mauritius) Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.
- (XIV) Broll Property and Facility Management Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.

- (XV) Safari Aventures Co. Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Uniciti 90203, Mauritius.

(b) Others*

- (I) Clarens Fields Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (II) Forestia Estate Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (III) Le Cabinet Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (IV) Pierrefonds Estate Company Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (V) Société Reufac, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (VI) Golf Estate Company Limited, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (VII) Tamarina Leisure Properties Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (VIII) Uniciti Commercial Properties, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (IX) Uniciti Eduhousing Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (X) Uniciti Education Properties Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (XI) Uniciti Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (XII) Uniciti Management Services Co Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (XIII) Uniciti Office Park Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.
- (XIV) Uniciti Residential Properties Co Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.

Middlesex University Mauritius and Westcoast International Schools (Primary and Secondary) have their own management and are separately responsible for the implementation of the Data Protection requirements.

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(XV) Uniciti Sports and Cultural Properties Ltd, with registered address at 4, Uniciti Office Park, Rivière Noire Road, Bambous 90203.

** SPVs having no employees and whose operations are run by Medine Limited.*

(c) Business Functions

This Privacy Charter governs all business activities of Medine which is involved in the processing of Personal data and any person working under Medine's direction or control and helps in managing the risks associated to privacy within related business activities.

(d) Data Subjects, Data Controllers and Data Processors

Medine processes personal data of data subjects through its relationships as controller or processor. A Data Subject is an identified or identifiable individual, 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 individual.

Medine would typically be a controller where it determines the purposes and means of the processing of personal data and has decision making power with respect to the processing.

Medine would be a processor where it processes personal data on behalf of a controller.

2. PRIVACY STATEMENT

At Medine, privacy matters. We respect the privacy of our data subjects with whom Medine has business interactions and commit to protect their personal data in accordance with the DPA and GDPR.

3. PRIVACY OBJECTIVES

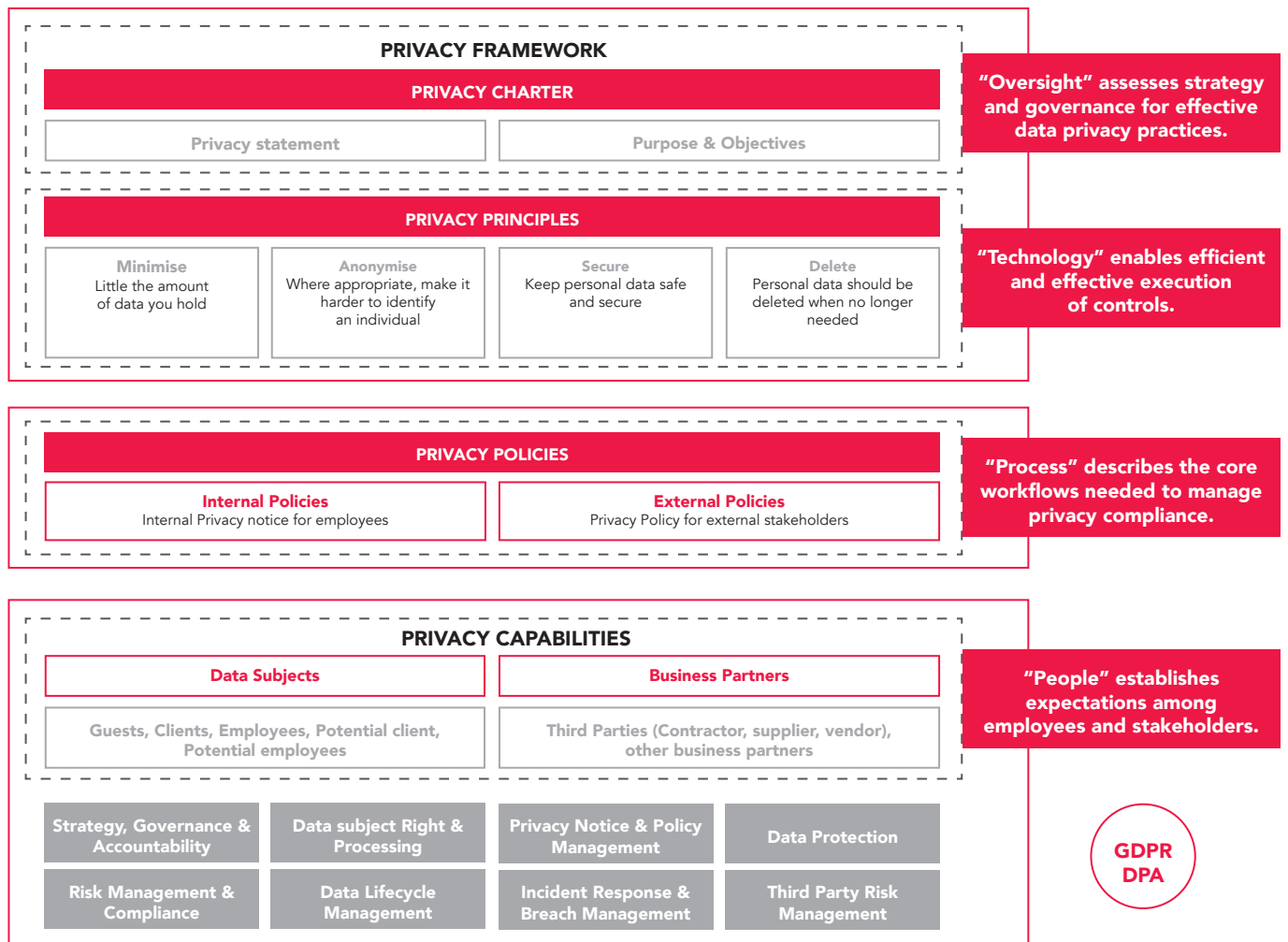
The objective of the Privacy framework is to protect the personal data that Medine collects, generates, uses, stores, and/or discloses. In this pursuit, Medine has defined three crucial strategic objectives which all support its strategy and business:

- (I) To commit and connect with data subjects while respecting their privacy and rights of freedom;
- (II) To comply with legal and regulatory obligations and minimise regulatory risks;
- (III) To be a competitive differentiator.

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4. MEDINE'S PRIVACY FRAMEWORK

The four components provide a complete view of effective data privacy protection to build a maturity framework. The components are the enablers of the framework.



- **"Oversight"** assesses the governance for effective data privacy practices. This component helps to define and deliver on privacy objectives according to available resources and business needs. It also helps us to develop ways to evaluate their performance levels and verify that our objectives are met. It relates to the privacy charter, principles and ultimately to the strategy, governance and accountability domain.
- **"Technology"** enables efficient and effective execution of controls. This component describes the technical capabilities to secure data and control data access. This component also helps security and privacy professionals define controls for data collection, use, storage, and retention. It relates to the data protection domain.
- **"Process"** describes the policies and procedures to manage privacy compliance. These policies elaborate on how to keep the data subject informed. The data inventory and data maps describe how companies should understand, track, and control the flow of data inside and outside of their systems. This includes process controls that help address privacy requirements and relates to notice and policy management, data lifecycle management, incident response and breach management, third party risk management and risk management and compliance domains.
- **"People"** establishes privacy expectations among our data subjects. This component focuses on the human factors impacting privacy practices. It includes mechanisms to set expectations for behaviour internally to meet privacy demands and describes how to manage these expectations across the business. Critically, this section also describes methods for understanding and delivering on the privacy expectations of our data subjects and it relates to the data subject rights and processing domains.

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5. MEDINE'S PRIVACY PRINCIPLES

Medine has recognised the importance of maintaining the privacy of personal and sensitive data of our employees, clients, suppliers/service providers and partners. The nature of our business requires us to collect and handle such information, and we have a responsibility to protect this information for as long as it is in our possession. At Medine, respecting our data subjects is part of our core values, along with being committed to providing services in an ethical manner.

To support these obligations, we have created a set of data privacy principles, which guide our efforts as they relate to privacy and the handling and protection of personal and sensitive data.

Medine's privacy principles are based on internationally recognised fair information practices and principles and are in the spirit of Medine's ethics. The following principles are embodied in Medine's Privacy Policy. Together, the principles and policies express and support Medine's privacy commitment to our data subjects and all persons with whom we have business interactions.

We respect privacy when:

(I) Maintain Governance Structure

We ensure that there are individuals responsible for data privacy, accountable management, and management reporting procedures.

(II) Maintain Personal Data Inventory

We maintain an inventory of the location of key personal data storage or personal data flows with defined classes of personal data. We collect minimum data.

(III) Maintain Data Privacy Policy

We maintain a data privacy policy which meets legal requirements and addresses operational risks.

(IV) Processing of Personal data/Special categories of personal data

We process personal information in accordance to the six (6) principles of processing. That is, we process any personal data of a data subject or a child concerning their religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour when we obtain the explicit consent of the data subject or the parent or guardian of the child, or where we have a legitimate reason to process these special categories of personal data.

(V) Embed Data Privacy into Operations

We maintain operational policies and procedures consistent with the data privacy policy, legal requirements, and operational risk management objectives.

(VI) Maintain Training and Awareness Program

We provide ongoing training and awareness to promote compliance with the data privacy policy and to mitigate operational risks.

(VII) Manage Information Security Risk and Data Protection Impact Assessment (DPIA)

We maintain an information security program based on legal requirements and ongoing risks assessments.

We carry out data protection impact assessments for required processing.

(VIII) Manage Third-Party Risk

We maintain contracts with third parties and affiliates consistent with the data privacy policy, legal requirements, and operational risk tolerance.

(IX) Maintain Security

We process data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

(X) Maintain Procedures for Enquiries and Complaints

We maintain effective procedures for interactions with data subjects about their personal data.

(XI) Monitor for New Operational Practices

We monitor organisational practices to identify new processes or material changes to existing processes and ensure the implementation of Privacy by Design principles.

(XII) Maintain Data Privacy Breach Management Program

We maintain an effective data privacy incident and breach management program.

(XIII) Monitor Data Handling Practices

We verify that operational practices comply with the data privacy policy and operational policies and procedures. We keep data accurate and up to date.

(XIV) Track External Criteria

We track new compliance requirements, expectations, and best practices and effectiveness of privacy framework.

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6. LAWFULNESS, FAIRNESS AND TRANSPARENCY

(a) Lawful basis of processing: Processing of personal data would be considered lawful if one of the following conditions is met:

- when the data subject has given explicit consent;
- to meet contractual obligations entered into by the data subject (e.g., to provide hospitality services, for recruitment, employment, or third-party contracts);
- to comply with the data controller's legal obligations (compliance with laws and regulations);
- to protect the data subject's vital interests (to protect someone's life);
- for tasks carried out in the public interest (e.g., participation in research);
- for the purposes of legitimate interests pursued by the data controller.

(b) Fairness: means that there must be a fair balance between the personal data which the organisation process as well as the reasons why it processes them, and what it has said, promised and described in the information provided to data subjects.

(c) Transparency: For the sake of transparency and in line with data subjects' right to information, we have issued the following policies that describe the purposes and ways in which we collect, process and store personal data, inform data subjects of their rights and provide the contact details to facilitate queries, complaints and the exercise of data subject rights:

- (I) A Privacy Policy intended for our external stakeholders. This policy is accessible on our websites and mentioned whenever we collect personal data (e.g. on data collection forms, and email footer);
- (II) A Privacy Notice for Employees.

7. PRIVACY GOVERNANCE STRUCTURE

Medine has defined an organisational model with specified roles and responsibilities to establish governance and oversight over the Medine Privacy Programme. We have established clear accountability for the management, operation, enforcement, and monitoring of the Privacy Programme in line with regulatory requirements and business commitments.

7.1 RESPONSIBILITIES OF THE STEERING COMMITTEE

As a project sponsor, the Steering Committee is informed on the progress of the Privacy Programme. The committee supports the privacy governance and provide independent objective assurance on the effectiveness of the management of privacy risk across Medine. The Steering Committee is responsible for the following:

- Take project decision at critical stages
- Supervise and guide DPO and the privacy champions
- Allocate budget and resources
- Demonstrate commitment to the Privacy programme
- Assist in driving changes in privacy policies and procedures
- Assist DPO in communicating to internal and external stakeholders on privacy matters

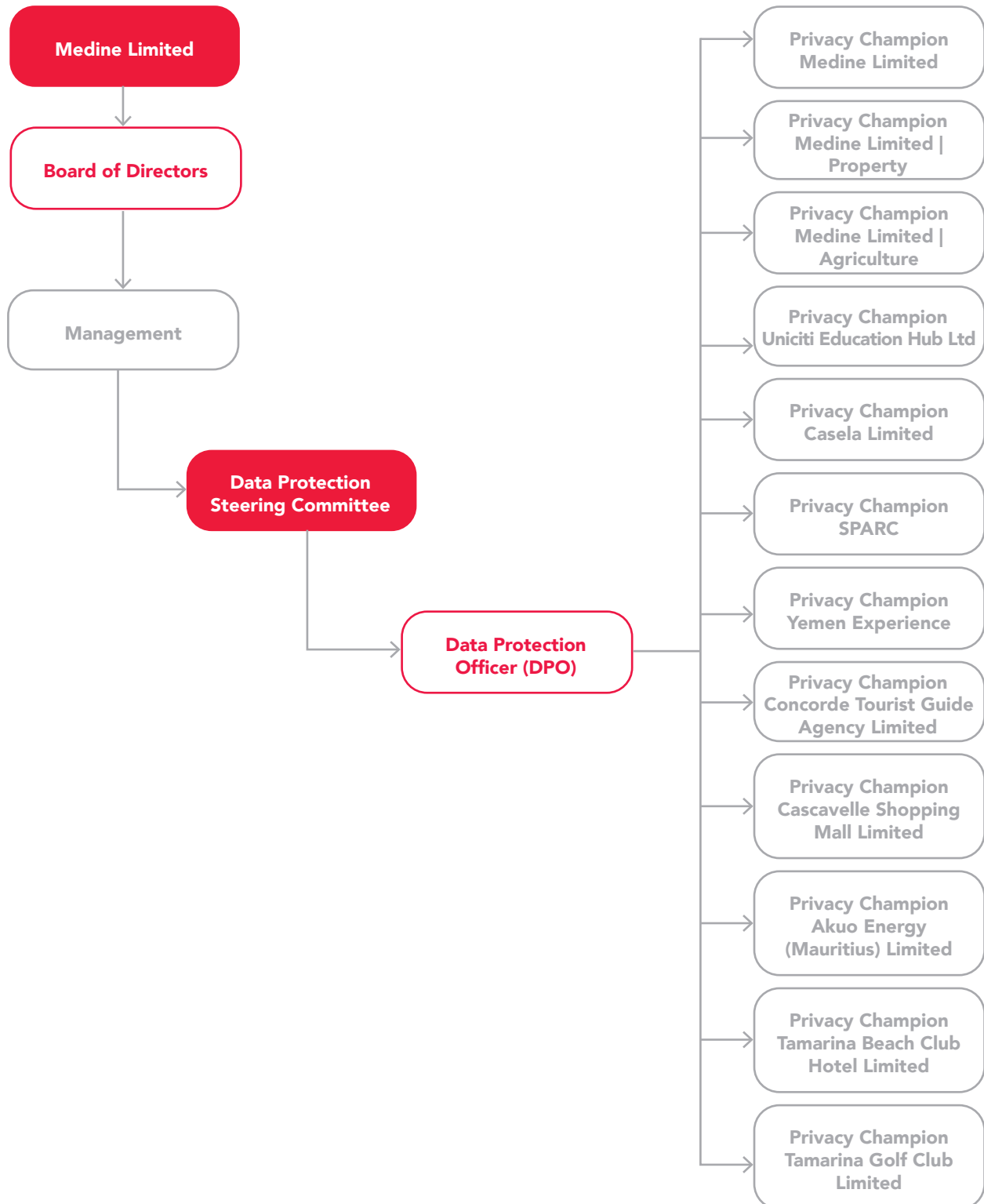
As issues related to the Privacy programme impact many parts of an organisation and its business processes, Medine Steering Committee is composed of a cross-section of senior-level employees. While some will be selected because their responsibilities involve them in the collection, protection, management or use of personal data, others will be selected because of their involvement in decisions that could potentially impact the regulatory compliance requirements. Medine will have the authority at any time to change the membership of the Committee and to fill vacancies as appropriate.

The Steering Committee shall be chaired by the DPO, with senior executive representation from the following business and corporate functions ideally:

- Legal representative.
- Information Technology (IT).
- Finance.
- Marketing/Communication/ CRM.
- Human Resources.
- Any other person which is deemed fit.

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The Steering Committee convenes as needed to administer the Privacy Programme and will conduct at least one documented meeting per year to address the enterprise privacy risk assessment and evaluate the effectiveness of the Privacy Programme. The DPO delivers an annual privacy report on the status the Privacy Programme. The privacy report is tabled as a component in the Audit and Risk Committee reporting to the Board. The meeting can be held on a quarterly basis in the first year of implementation and consequently as the Programme mature, the Steering Committee can be convened on a biannual or annual basis.



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(a) DPO Responsibilities

The DPO will have the following responsibilities:

- Convene the Data Protection Steering Committee at least quarterly but will be available on an ad hoc basis throughout the year, as pertinent initiatives or issues arise;
 - Establish corporate risk profile and risk tolerance to guide privacy program decision-making;
 - Carry out data privacy impact assessments;
 - Develop a process to monitor and assess the Privacy Programme to include, but not limited to, providing regular and timely updates on the status of key initiatives and metrics approved by Medine; Review long and short-term privacy program goals to ensure alignment with enterprise priorities;
 - Investigate on privacy breaches;
 - Coordinate and review an annual evaluation of the state of Medine's Privacy Programme including KPIs;
 - Engage Privacy champions to support privacy guideline/ policy development as necessary;
 - Approve all plans, guidelines, policies, standards, and/ or procedures – and review internal initiatives – related to the potential adoption and use of new technologies and communication tools in consideration of privacy requirements;
 - Report to management on the effectiveness of the privacy practices on a periodic basis
- To maintain an updated inventory of personal data flow at the departmental level;
 - To work in close collaboration with the local and group IT;
 - To monitor and facilitate the implementation of data protection measures initiated at corporate level;
 - To promote employee awareness on data protection and organise training as required;
 - In the event of a data breach or incident, to:
 - Alert the DPO within the least delay;
 - Provide the proper advice and assistance to the data owner (where the incident occurred);
 - Gather information on the data breach/incident and maintain a log of initiatives taken for onward communication to the DPO;
 - Collaborate with the DPO in assessing and managing the risks;
 - Monitor/facilitate the implementation of measures agreed with the DPO
 - Assist DPO in addressing cross-functional budget and resource needs;

While the DPO will monitor and facilitate the implementation of data protection regulations across Medine, Managing Director/ General Manager/ Head of each entity will have responsibility for compliance with the applicable data protection legislations in his/ her respective entity. The Chief Officer may designate an appropriate person at the entity to assist with this task. This person will be known as the Data Privacy Champion for the entity.

(b) Data Privacy Champions

- To act as a channel of communication between the DPO and the entity they represent;
 - To respond to internal data protection queries and provide guidance to colleagues after consulting the DPO;
 - To escalate data protection queries to the DPO within the least delay;
 - To report to the DPO on a regular basis on all data protection queries received/attended and initiatives taken at entity level (this will be cascaded by the privacy representative of each entity);
- Key initiatives, trends, and updates on Privacy matters:
 - New/emerging privacy laws/regulations, industry relevant enforcement actions, investigations and class action lawsuits
 - Status of major privacy compliance programs (EU GDPR and DPA 2017) and major privacy initiatives (Consent Management, Data Discovery/Data Loss Prevention, etc.)
 - Recent privacy incidents and/or breaches, results from root cause analysis, and planned mitigations;
 - Resolution of outstanding, escalated privacy concerns;
 - Review and approval of changes to privacy policies, notices, consent mechanisms and KPIs;

7.2 AGENDA OF THE STEERING COMMITTEE

The standing agenda for the Steering Committee may include but shall not be limited to the topics below:

- Key initiatives, trends, and updates on Privacy matters:
 - New/emerging privacy laws/regulations, industry relevant enforcement actions, investigations and class action lawsuits
 - Status of major privacy compliance programs (EU GDPR and DPA 2017) and major privacy initiatives (Consent Management, Data Discovery/Data Loss Prevention, etc.)
 - Recent privacy incidents and/or breaches, results from root cause analysis, and planned mitigations;
- Resolution of outstanding, escalated privacy concerns;
- Review and approval of changes to privacy policies, notices, consent mechanisms and KPIs;

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- Updates from the business on major initiatives in process or planned with potential privacy implications:
 - Planned development/launch of new products and services
 - Expansion into new countries/regions, including roll-out of existing products/services into countries where that product/service has not been delivered historically
 - Planned or desired significant data use cases (e.g., new sharing of data across products/services/platforms, major marketing campaigns, big data analytics);
- Results of review of the annual evaluation of the state of Medine's Privacy framework.

7.3 CONTACT INFORMATION

Any questions concerning the material presented in this document or general enquiries can be addressed to the contacts listed in the annex.

8. PRIVACY REPORTING

Medine has nominated a Data Protection Officer ("DPO") who worked with members of the Steering Committee and identified data privacy champions of each entity.

The Steering Committee recommends the privacy charter, policy(ies) and overall program; and the DPO updates and reports on privacy matters to the Audit and Risk Committee and the Board of Directors.

The DPO oversees privacy matters for all entities, facilitates implementation and coordinates the response to major incidents.

The DPO develops an annual report on the current status of the Medine Privacy Programme, to be delivered to the Audit and Risk Committee.

This report shall include at a minimum:

- Summary of the privacy program's progress on meeting its objectives
- Key privacy risks and issues identified over the fiscal year (quarterly/bi-annually)
- Resource needs (people, technology or any other investment)
- Key decision points for the Steering Committee
- Future action plan

The DPO will monitor, measure and report on the effectiveness of the privacy framework. A set of KPIs is in place for this purpose.

9. TRAINING & AWARENESS

Medine has established and is maintaining a privacy training and awareness program to ensure that personnel receive training related to their ongoing privacy obligations and responsibilities as part of the Privacy framework.

- The Steering Committee review the privacy training program on a periodic basis, not less frequently than annually, and where necessary will update the program so that it remains up-to-date and accurate;
- Medine will maintain a mechanism for personnel to ask privacy-related questions or to submit privacy-related concerns for review and consideration by the DPO who will use the same channel to respond to inquiries;
- As part of the onboarding process, Medine requires all newly hired or newly engaged personnel covered by this Policy to confirm in writing their understanding and acceptance of their responsibility to comply with Medine policies and procedures related to the privacy and security of personal data;
- Medine personnel are required to sign a confidentiality statement, which includes information regarding disciplinary actions for non-compliance;
- Medine personnel must complete privacy and security training on an annual basis and maintain a certificate of completion/attendance certificate;
- When there is a change/update to the privacy policies or procedures, the DPO delivers updated training or distributes awareness materials of such changes to affected personnel within 60 days of the effective implementation.

10. MAINTENANCE AND ADMINISTRATION

Monitoring to ensure that your privacy policies, procedures and guidance are being followed is a key component of a successful end-to-end privacy framework.

- Business Changes - Business changes that result in a significant addition or change to the nature or handling of personal data may necessitate revisions to this document. Such changes will be developed and approved by the Steering Committee.
- Regulatory Changes - Regulatory changes may necessitate revisions to this document. Such changes will be developed and approved by the DPO together with the Legal Counsel.
- Ownership and Responsibility - Ownership and responsibility for this document, and its component parts, rests with Medine's DPO. Questions and requests to update (e.g. per business or regulatory changes) should be directed to Medine's DPO.

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11. ACCOUNTABILITY & RECORD KEEPING

In line with the principle of 'accountability', data controllers shall maintain appropriate records in order to demonstrate compliance with the applicable data privacy law or data protection principles. Documentation and records shall be maintained in accordance with local law requirements and shall include (but not limited to) the following:

- (I) A privacy governance structure (Privacy Charter)
- (II) Policies and Standard Operating Procedures
- (III) Copies of all processing activities
- (IV) Data Subject request and response
- (V) Up-to-date data inventories and maps for each department / function
- (VI) Employee awareness training conducted
- (VII) Privacy policies communicated / acknowledged
- (VIII) Consent mechanisms and consents obtained
- (IX) Technical and organisational security measures
- (X) Data Protection Impact Assessments (DPIAs)/Privacy by design and by default exercise
- (XI) Transfer mechanism
- (XII) Audit and assessments of present data privacy practices
- (XIII) Data incidents/ breaches and reports made to Supervisory Authorities

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12. RELATED PRIVACY POLICIES & PROCEDURES

Medine has established and is maintaining a suite of policies, standards, and procedures documentation as well as other artefacts as needed to govern the Privacy framework and drive desirable employee behaviour aligned to the regulatory obligations and business commitments. The policies and procedures are:

- External Privacy Policy
- Privacy Policy for staff
- Job Applicants Policy
- Subject Access request procedures
- Data protection Impact Assessment
- Data Retention and Disposal Policy
- Data Classification Policy

13. VERSION CONTROL

Document Owner:

The Data Protection Officer shall be responsible for maintaining this Charter.

Revision History:

Version	Date	Author	Comments
1.0			Initial Privacy Charter

Effective date:

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Annex A – Key Definitions

Data Subject	An identified or identifiable individual, 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 individual;
Special categories of personal data	Special categories of personal data”, in relation to a data subject, means personal data pertaining to – (a) his racial or ethnic origin; (b) his political opinion or adherence; (c) his religious or philosophical beliefs; (d) his membership of a trade union; (e) his physical or mental health or condition; (f) his sexual orientation, practices or preferences; (g) his genetic data or biometric data uniquely identifying him; (h) the commission or alleged commission of an offence by him; (i) any proceedings for an offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any Court in the proceedings; or (j) such other personal data as the Commissioner may determine to be sensitive personal data.
Controller	“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Processor	“Processor” means a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller.
Anonymise	Make it impossible to re-identify a data subject from the information, taking into account all means likely reasonably to be used by anyone to re-identify them.
EEA	The member states of the European Union, Iceland, Liechtenstein, Norway and Switzerland ¹¹ .
Directive	Means Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regards to the processing of personal data and on the free movement of such data.
Processing	Means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Profiling	Any form of automated processing of personal data evaluating personal aspects relating to a natural person, in particular to analyse or predict the data subject’s performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements where it produces legal effects concerning him or her or similarly significantly affects him or her.
Supervisory authority	Any competent public body responsible for monitoring and enforcing compliance with privacy law.
Privacy by design	The term “Privacy by Design” means nothing more than “data protection through technology design.” Behind this is the thought that data protection in data processing procedures is best adhered to when it is already integrated in the technology when created.

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Annex B – Contact Information

Harry Bansropun	DPO	4016101	dpo@medine.com