

Provided by:



2/1/2024

107 Harrison Street NE
Leesburg, VA 201756
www.abacostrategy.com

PRIVACY AND PERSONAL DATA PROTECTION POLICY

Version 1.0

Prepared by: Ábaco Strategy, LLC



Uncontrolled, when printed.

The controlled copy of this document is maintained by the Quality Manager, electronically on the Ábaco's Intranet.

VERSION HISTORY

Version	Description of Change	Approved By	Effective Date
1.0	Initial version	Dan Navarro	2/1/2024

Table 1: Version History

DISTRIBUTION LIST

Distribution List	Description
All Employees	

Table 2: Distribution List



TABLE OF CONTENTS

1	INTRODUCTION	1
2	PRIVACY AND PERSONAL DATA PROTECTION POLICY.....	1
2.1	Scope and Applicability	1
2.2	Data Collection and Purpose.....	Error! Bookmark not defined.
2.3	Data Security and Storage	2
2.4	Data Access and Sharing.....	2
2.5	Data Accuracy and Updates.....	2
2.6	Data Subject Rights	2
2.7	Data Breach Response	2
2.8	Compliance with Laws and Regulations.....	2

TABLE OF TABLES

Table 1: Version History.....	i
Table 2: Distribution List.....	i



1 INTRODUCTION

In its everyday business operations Ábaco Strategy, LLC (Ábaco) makes use of a variety of data about identifiable individuals, including data about:

- Current, past, and prospective employees
- Customers
- Users of its websites
- Other stakeholders

In collecting and using this data, the organization is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps Ábaco is taking to ensure that it complies with it.

This control applies to all systems, people and processes that constitute the organization's information systems, including board members, directors, employees, suppliers and other third parties who have access to Ábaco systems.

The following policies and procedures are relevant to this document:

- Information Classification Procedure
- Information Labelling Procedure
- Records Retention and Protection Policy
- Acceptable Use policy
- Electronic Messaging Policy
- Internet Access Policy
- Social Media Policy
- Information Security Incident Response Procedure
- Information Security Roles, Responsibilities and Authorities

2 PRIVACY AND PERSONAL DATA PROTECTION POLICY

2.1 Scope and Applicability

This policy applies to all employees, contractors, and third parties associated with Abaco Strategy who have access to personal data during the course of their duties. It encompasses all forms of data, whether electronic or paper-based, and applies to data collected, processed, and stored within the United States and abroad.

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').
4. Accurate and, where necessary, kept up to date ('accuracy')
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation').



2.2 Data Security and Storage

Ábaco is committed to maintaining the security of personal data. Access to such data is restricted to authorized personnel only. We employ industry-standard security measures to protect against unauthorized access, disclosure, alteration, and destruction of personal information. Personal data is stored for the duration necessary to fulfill the purpose for which it was collected.

2.3 Data Access and Sharing

Access to personal data is granted on a need-to-know basis, with employees and contractors provided access only to the information necessary for their roles. Abaco Strategy does not share personal data with third parties unless required by law or with explicit consent from the data subject.

2.4 Data Accuracy and Updates

We strive to ensure that personal data collected and processed is accurate and up to date. Employees and contractors are encouraged to promptly update any changes to their personal information. Abaco Strategy regularly reviews and updates personal data to maintain its accuracy.

2.5 Data Subject Rights

Ábaco respects the rights of data subjects, including the right to access, correct, delete, or restrict the processing of their personal data. Data subjects may contact our Data Protection Officer to exercise these rights or seek clarification on how their data is being processed.

2.6 Data Breach Response

In the event of a data breach, Abaco Strategy will promptly assess the situation, take necessary measures to contain the breach, and notify the affected parties and relevant authorities as required by applicable laws and regulations.

2.7 Compliance with Laws and Regulations

Ábaco is committed to complying with all applicable privacy laws and regulations. Our Privacy and Personal Data Protection Policy is regularly reviewed to ensure its alignment with evolving legal requirements.

