

GDPR Policy

1. Data Protection Principles

The VDOC LLC is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- i. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- ii. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- iv. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- v. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- vi. Processed 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.

2. General Provisions

- i. This policy applies to all personal data processed by The VDOC LLC.

- ii. The Responsible Person shall take responsibility for the VDOC's ongoing compliance with this policy.
- iii. This policy shall be reviewed at least quarterly.
- iv. The VDOC LLC shall cooperate with the European Data Protection Authorities as an organisation that processes personal data.

3. Lawful, Fair and Transparent Processing

- i. To ensure its processing of data is lawful, fair and transparent, VDOC shall maintain a Register of Systems.
- ii. The Register of Systems shall be reviewed at least quarterly.
- iii. Individuals have the right to access their personal data and any such requests made to VDOC shall be dealt with in a timely manner.

4. Lawful Purposes

- i. All data processed by VDOC must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- ii. The VDOC LLC shall note the appropriate lawful basis in the Register of Systems.
- iii. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- iv. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the VDOC's systems.

5. Data Minimisation

- i. The VDOC LLC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- i. VDOC shall take reasonable steps to ensure personal data is accurate.
- ii. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / Removal

- i. To ensure that personal data is kept for no longer than necessary, the VDOC LLC shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- ii. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- i. The VDOC LLC shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- ii. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- iii. When personal data is deleted this should be done safely such that the data is irrecoverable.
- iv. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, VDOC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the appropriate Data Protection Authority.

10. Definitions

Encryption or encrypted data	The most effective way to achieve data security. To read an encrypted file, you must have access to a secret key or password that enables you to decrypt it. Unencrypted data is called plain text;
Plain text	Unencrypted data.
Hacker	A slang term for a computer enthusiast, i.e., a person who enjoys learning programming languages and computer systems and can often be considered an expert on the subject(s).
Information Resource	The data and information assets of an organization, department or unit.
Safeguards	Countermeasures, controls put in place to avoid, detect, counteract, or minimize security risks to physical property, information, computer systems, or other assets. Safeguards help to reduce the risk of damage or loss by stopping, deterring, or slowing down an attack against an asset.
Company	means The VDOC LLC, a Tennessee registered company (control no. 001037578), also known as VDOC or the VDOC.
Responsible Person	means The VDOC LLC Senior Management team
Personnel	means all staff and contractors working for the company
Computers	means all computers that are used to access VDOC data and are used for work purposes by Staff and Contractors (this includes company and personal machines)
Business Owners	means the senior management team of the company and owners of the company.
Systems	means any systems, infrastructure, applications, data, networks and websites that are owned and managed by VDOC.
Confidential	Any The VDOC LLC information that is not publicly known and includes

<p>Information (Sensitive Information)</p>	<p>tangible and intangible information in all forms, such as information that is observed or orally delivered, or is in electronic form, or is written or in other tangible form.</p> <p>Confidential Information may include, but is not limited to, source code, product designs and plans, beta and benchmarking results, patent applications, production methods, product roadmaps, customer lists and information, prospect lists and information, promotional plans, competitive information, names, salaries, skills, positions, pre-public financial results, product costs, and pricing, and employee information and lists including organizational charts.</p> <p>Confidential Information also includes any confidential information received by The VDOC LLC from a third party under a non-disclosure agreement.</p>
<p>Protected data</p>	<p>See PII, PHI</p>
<p>Protected Health Information (PHI)</p>	<p>Under US law this is any information about health status, provision of health care, or payment for health care that is created or collected by a "Covered Entity" (or a Business Associate of a Covered Entity), and can be linked to a specific individual.</p>
<p>Personally Identifiable Information (PII)</p>	<p>Any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered</p>