

# **GDPR Data Protection Policy**

# 1. Introduction

This policy outlines how FinAds Limited and SPRS Consulting India Pvt Ltd T/A GloPass Study Abroad (hereinafter referred to as "the Companies") collect, use, store, and protect personal data in accordance with the General Data Protection Regulation (GDPR). The Companies are committed to ensuring the privacy and security of personal data entrusted to them.

# 2. Scope

This policy applies to all personal data processed by the Companies, including data of employees, clients, website visitors, and any other individuals whose data we handle.

# 3. Definitions

- Personal Data: Any information relating to an identified or identifiable natural person ("data subject").
- Data Subject: The person whose personal data is being processed.
- **Processing:** Any operation performed on personal data, such as collection, storage, use, or deletion.
- **Data Controller:** The Companies, as they determine the purposes and means of the processing of personal data.
- Data Processor: Any natural or legal person who processes personal data on behalf of the Data Controller.
- GDPR: The General Data Protection Regulation (EU) 2016/679.

### 4. Principles of Data Processing

The Companies adhere to the following GDPR principles:

- Lawfulness, Fairness, and Transparency: Personal data is processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes.
- Data Minimization: Personal data is adequate, relevant, and limited to what is necessary.
- Accuracy: Personal data is accurate and kept up to date.
- **Storage Limitation:** Personal data is kept in a form which permits identification of data subjects for no longer than is necessary.
- Integrity and Confidentiality (Security): Personal data is processed in a manner that ensures appropriate security.

# 5. Lawful Basis for Processing

The Companies process personal data based on one of the following lawful bases:

- Consent of the data subject.
- Performance of a contract.
- Compliance with a legal obligation.
- Protection of vital interests.
- Performance of a task carried out in the public interest.
- Legitimate interests pursued by the Companies.

# 6. Data Subject Rights

# Data subjects have the following rights:

- Right to Access: To request access to their personal data.
- Right to Rectification: To request correction of inaccurate data.
- Right to Erasure ("Right to be Forgotten"): To request deletion of their data.
- Right to Restriction of Processing: To request limitation of processing.

#### GloPass- Study Abroad is trading name of SPRS Consulting India Private Ltd & FinAds Consulting Ltd UK

No 22, Bypass Road, Near Jeyasakthi Hotel, Kalavasal, Madurai-625016,



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- **Right to Data Portability:** To receive their data in a portable format.
- **Right to Object:** To object to the processing of their data.
- **Right not to be subject to automated decision-making:** to not be subject to decisions based solely on automated processing.

# 7. Data Security

The Companies implement appropriate technical and organizational measures to ensure the security of personal data, including:

- Data encryption.
- Regular security assessments.
- Access controls.
- Staff training on data protection.
- Incident response procedures.

# 8. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, or as required by law.

# 9. Data Transfers

If personal data is transferred to third countries outside the European Economic Area (EEA), the Companies ensure that appropriate safeguards are in place, such as standard contractual clauses or adequacy decisions.

### **10. Data Breach Notification**

In the event of a data breach, the Companies will notify the relevant supervisory authority and affected data subjects, as required by the GDPR.

### 11. Roles and Responsibilities

- **Data Protection Officer (DPO):** [If applicable, insert DPO details. if not applicable, designate a person responsible for data protection.]
- Employees: All employees are responsible for adhering to this policy and protecting personal data.

# 12. Policy Review

This policy will be reviewed and updated regularly to ensure compliance with the GDPR and reflect changes in business practices.

# **13. Contact Information**

For questions or concerns regarding this policy, please contact:

- FinAds Limited: T/A GloPass Study Abroad [Mr. Sankar Krishnamoorthy, +44 79615 72520]
- SPRS Consulting India Pvt Ltd T/A GloPass Study Abroad: [Mr. Thangam Karthick +91 76677 11335]

# 14. Cookies and Website Data.

- The companies' websites will have a clear cookie policy.
- The companies' websites will have a clear privacy policy.
- The companies will request consent to use cookies when a user enters the websites.