# Data protection policy

## Goal of the data protection policy

#### **Preamble**

Helping Cards produces educational card games to engage children with household chores but more importantly, with their families, making them more resilient, more self-reliant and more able to grow into healthy, happy, fulfilled adults who respect themselves and other people. In the same way, we set out our data protection policy to keep you and the information you obtain about you through our website safe.

## Security policy and responsibilities in the company

- For a company, in addition to existing corporate objectives, the highest data protection goals are to be defined and documented. Data protection goals are based on data protection principles and must be individually modified for every company.
- Determination of roles and responsibilities (e.g. representatives of the company, operational data protection officers, coordinators or data protection team and operational managers)
- Commitment to continuous improvement of a data protection management system
- Training, sensitisation, and obligation of the employees

## Legal framework in the company

- Industry-specific legal or conduct regulations for handling personal data
- Requirements of internal and external parties
- Applicable laws, possibly with special local regulations

## **Documentation**

- Conducted internal and external inspections
- Data protection need: determination of protection need with regard to confidentiality, integrity and availability.

## Existing technical and organisational measures (TOM)

Appropriate technical and organisational measures that must be implemented and substantiated, taking into account, inter alia, the purpose of the processing, the state of the technology and the implementation costs.

The description of the implemented TOM can, for example, be based on Art. 32 GDPR:

- Pseudonymisation (Art. 32 (1) (a) of the GDPR; Art. 25 (1) of the GDPR)
- Encryption (Art. 32 (1) (a) of the GDPR)
- Confidentiality (Art. 32 (1) (b) of the GDPR)
  - Access Control

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- Entry Control
- o Authorisation Control
- Separation Control
- Integrity (Art. 32 (1) (b) of the GDPR)
  - Transfer Control
  - o Input Control
- Availability and Resilience (Art. 32 (1) (b) of the GDPR)
  - o Availability Control
  - o Resilience Control
- Recoverability (Art. 32 (1) (c) of the GDPR)
- Procedures for Regular Review, Assessment and Evaluation (Art. 32 (1) (d) of the GDPR; Art. 25 (1) of the GDPR)
  - o Data-Protection-Management-System
  - o Incident-Response-Management-System
  - o Data Protection by Design and Default
  - o Order Control