

# Data Privacy and Security Policy

## 1. Introduction

Beamonics is committed to maintaining the highest standards of data privacy and security. This policy outlines our approach to protecting personal data and ensuring compliance with relevant regulations, including the European Sustainability Reporting Standards (ESRS), the Corporate Sustainability Reporting Directive (CSRD), and the General Data Protection Regulation (GDPR).

## 2. Scope

This policy applies to all employees, contractors, and third-party service providers who handle personal data on behalf of Beamonics. It covers all personal data processed, stored, or transmitted by Beamonics in any form, including electronic, paper, or other media.

## 3. Personal Data Protection

### 3.1 Definition of Personal Data

Personal data refers to any information relating to an identified or identifiable natural person. This includes, but is not limited to, names, contact information, identification numbers, location data, and online identifiers.

### 3.2 Principles of Data Protection

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimization:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.

- **Storage Limitation:** Personal data shall be 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.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

### 3.3 Data Subject Rights

Beamonics respects the rights of data subjects, which include:

- **Right to Access:** Data subjects have the right to access their personal data and obtain information about its processing.
- **Right to Rectification:** Data subjects can request the correction of inaccurate personal data.
- **Right to Erasure:** Data subjects can request the deletion of their personal data under certain conditions.
- **Right to Restrict Processing:** Data subjects can request the restriction of processing their personal data under specific circumstances.
- **Right to Data Portability:** Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Data subjects can object to the processing of their personal data on grounds relating to their particular situation.

## 4. Data Security Measures

### 4.1 Organizational Measures

- **Governance:** Establish a data protection governance structure to oversee compliance with data privacy and security policies.
- **Training and Awareness:** Conduct regular training and awareness programs for employees on data privacy and security practices.
- **Data Protection Officer (DPO):** Appoint a DPO to monitor compliance with data protection regulations and policies.

### 4.2 Technical Measures

- **Access Control:** Implement access control mechanisms to ensure that only authorized personnel have access to personal data.
- **Encryption:** Use encryption to protect personal data in transit and at rest.
- **Network Security:** Implement firewalls, intrusion detection systems, and other network security measures to protect against cyber threats.
- **Data Backup:** Regularly back up personal data and ensure backups are stored securely.
- **Incident Response:** Develop and maintain an incident response plan to address data breaches and other security incidents promptly.

#### 4.3 Physical Measures

- **Secure Facilities:** Ensure that facilities where personal data is processed are secure and access is restricted to authorized personnel.
- **Paper Records:** Store paper records containing personal data in locked cabinets and restrict access to authorized individuals.

## 5. Compliance with GDPR

### 5.1 Legal Basis for Processing

Beamonics shall ensure that there is a lawful basis for processing personal data as required by the GDPR. The lawful bases include consent, performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task carried out in the public interest, and legitimate interests.

### 5.2 Data Protection Impact Assessments (DPIAs)

Beamonics shall conduct DPIAs for processing activities that are likely to result in a high risk to the rights and freedoms of data subjects. The DPIAs will identify and mitigate risks associated with data processing activities.

### 5.3 Record of Processing Activities

Beamonics shall maintain a record of processing activities in accordance with GDPR requirements. This record will include information such as the purposes of processing, categories of data subjects, categories of personal data, recipients of personal data, and retention periods.

#### **5.4 Data Breach Notification**

In the event of a data breach, Beamonics shall notify the relevant supervisory authority within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of data subjects. Where the breach is likely to result in a high risk, Beamonics shall also inform the affected data subjects without undue delay.

## **6. Monitoring and Review**

Beamonics shall regularly monitor and review this Data Privacy and Security Policy to ensure its effectiveness and compliance with applicable laws and regulations. This policy shall be reviewed at least annually and updated as necessary to reflect changes in data protection laws, regulations, and best practices.

## **7. Contact Information**

For any questions or concerns regarding this policy or data privacy and security practices at Beamonics, please contact:

#### **Data Protection Officer (DPO)**

Beamonics

Can Xu, [info@beamonics.se](mailto:info@beamonics.se)

By adhering to this Data Privacy and Security Policy, Beamonics demonstrates its commitment to protecting personal data and maintaining the trust of its stakeholders. This policy serves as a foundation for our data protection practices and ensures our compliance with ESRS, CSRD, and GDPR requirements.