

Data Protection Policy for MicahTek, Inc.

Introduction

MicahTek, Inc. provides services to our clients who gather and use information about individuals. These individuals can include customers, suppliers, business contacts employees and other people the organization has a relationship with. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

Data Protection Law

Data Protection Laws describe how organizations must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. Personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The privacy policy of MicahTek, Inc. requires our clients to assert that collected personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Be processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- If client is located in the EEA that personal information not be transferred outside of the EEA unless that country or territory also ensures an adequate level of protection

Policy Scope

This policy applies to MicahTek, Inc. and requested of all MicahTek, Inc. clients that all data the company holds relating to identifiable individuals. This will include, but not be limited to:

- Names of individuals
- Postal addresses
- Email addresses
- Phone numbers
- Company names and addresses

Responsibilities

Everyone employed by MicahTek, Inc. carries responsibilities for ensuring that data is collected, stored and handled appropriately. Data must be handled in line with this policy and with data protection principles.

The people with key areas of responsibility are:

- The Board of MicahTek, Inc. is ultimately responsible for ensuring that the company meets all of its legal obligations
- The Data Protection Officer is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues
 - Reviewing all data protection procedures and related policies in line with an agreed schedule
 - Arranging data protection training and advice for the people covered by this policy
 - Handling data protection questions from staff and anyone else covered by this policy
 - Dealing with requests from individuals to see the data MicahTek, Inc. holds about hits, also called subject access requests
 - Reviewing any contracts or agreements with 3rd parties that may handle the company's sensitive data
 - Approving data protection statements attached to emails
- The IT management is responsible for:
 - Ensuring all systems, services and equipment used for storing client data meet acceptable security standards
 - Performing regular scans and checks to ensure security hardware and software is functioning properly (i.e. PCI compliancy).
 - Evaluating any third-party services the company is considering using to store or process client data (3rd party services always approved by client).

General Staff Guidelines

- Only those requiring access to personal data covered in this policy should have access to it
- Data should not be shared informally. When access to confidential information is required, employees can request it from their Manager
- MicahTek, Inc. will provide training to all employees to help them understand their responsibilities when handling data
- Employees should keep all data secure by taking sensible precautions following the guidelines below
- Strong passwords must be used and they should never be shared
- Personal data should not be disclosed to unauthorized people either within the Company or externally
- MicahTek, Inc. recommends to clients that client data should be regularly reviewed and updated if it is found to be out of date. If no longer required MicahTek, Inc. will request to client the data should be deleted and securely disposed of
- Employees should request help from the Data Protection Officer if they are unsure of any aspect of data protection.

Data Storage and Use

For data stored on paper:

- It must be kept in a secure place where unauthorized people cannot see it.
- When not required paper or files should be kept in a locked drawer or filing cabinet
- Employees should make sure paper and printouts are not left where unauthorized people can see them
- Data printouts should be shredded and disposed of securely when no longer required

For data stored electronically:

- Data should be protected by strong passwords that are changed regularly and never shared
- Data on removable media (i.e. CD or DVD) must be kept locked away securely
- Data should only be stored on designated drives and servers and should only be uploaded to an approved secure cloud server if used
- Servers with personal data should be sited in a secure location away from the general office space
- Data should be backed up frequently, and backups should be tested regularly according to the company's standard backup procedures
- Data should not be saved directly to laptops or other mobile devices such as tablets or smart phones
- All servers and computers containing data should be protected by approved security software.
- When working with personal data, employees should ensure the screens of their computers are locked when unattended
- Personal data should not be sent by email as this is not a secure form of communication
- Personal data should not be transferred outside of the EEA unless that country or territory also ensures an adequate level of protection

Data Accuracy

MicahTek, Inc. will take reasonable steps to ensure client data is kept accurate and up to date. It is the responsibility of the Company and its employees to recommend to clients to take reasonable steps to ensure data is accurate and up to date.

- Data should be stored in as few places as necessary. Staff should not create any unnecessary additional data sets
- Staff should take every effort to ensure that data is updated, i.e. confirm a customer details when they call
- Data should be updated as inaccuracies are discovered, i.e. remove a customer from a database when they are not reachable with the current details on file

Subject Access Requests

All individuals who are the subject of personal data held by MicahTek, Inc. are entitled to:

- Ask what information the Company holds about them and why
- Ask how to gain access to it
- Be informed on how to keep it up to date
- Be informed on how the Company is meeting its data protection obligations

These requests are called "subject access requests". The identity of anyone making a subject access request must be verified before the Company or its employee hands over any information.

Disclosing Data for other reasons

In certain circumstances the law (as law permits) allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances MicahTek, Inc. may disclose requested data (with client knowledge). However the Privacy Officer will ensure that the request is legitimate, seeking assistance from Senior Management and from the Company's legal advisers.

As part of your inquiry we may collect your name, telephone, mobile and email contact details and information to assess your service requirements.

We may use your email or telephone contact number/s to contact you regarding to your inquiry and subsequent quotation for services if appropriate.

If you are providing information and/or contact data for a third party (i.e. employer or someone other than yourself) we assume that you have their explicit consent to share this with us. They retain the right to access, correct or remove this information at any point.

How we use and store your personal information.

Data may be stored electronically to communicate with you regarding to your inquiry or for other necessary services. Electronic data will be stored in a secure file location and would be accessible to the service team members and Management of MicahTek, Inc.. Any hard copies of your data will be securely shredded following your inquiry

How to contact us

Please contact us if you have any questions about our privacy policy or information that we hold about you.

Mike Conners - Data Privacy Officer

By telephone: 918-449-3300

By email: mconners@micahtek.com

By writing: MicahTek, Inc., 8215 S Elm Place, Broken Arrow, OK 74011