



New Era Technology, Inc. Data Protection Policy

Classification: Public

Data Protection Statement

New Era Technology, Inc., and its subsidiaries (collectively the "Company" or "New Era"), is committed to protecting New Era Technology and its customers' data and infrastructure by adhering to the protocols and guidelines that govern data protection measures and the defined rules for company and personal use.

We expect this policy to be upheld by all employees (permanent, temporary, or contracted), including executives, officers, and directors of New Era, and by such other entities as specified herein.

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1. Terms and Definitions

Term / Acronym	Definition / Meaning
'Data Protection Law'	includes the UK and EU GDPR, US HIPAA/HITECH and relevant state laws, e.g., CA CCPA/CPRA, Canada PIPEDA, Brazil LGPD, Australia Privacy Act, China PIPL, and any other international data protection laws/rules/regulations applicable to New Era or to those entities processing personal data on New Era's behalf.
"staff", "users", "personnel"	means those who are employed by New Era Technology on a fulltime, part-time, or temporary basis; those who access and / or utilize New Era Technology's information resources, including, but not limited to employees, contractors, interns, third and external parties.
"we", "our", "New Era", or "New Era Technology"	refers to New Era Technology, Inc., and its subsidiaries.

2. Scope

This Policy applies to all New Era Technology's remote workers, permanent, and part-time employees, contractors, volunteers, suppliers, interns, and/or any individuals with access to the company's electronic systems, information, software, and/or hardware.

The terms set out in this policy work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreements and/or employment contracts.

In regions where specific Data Protection Law applies, New Era will comply with such laws, rules, and regulations alongside this policy. For clarity, this policy is not intended to restrict communications or actions protected or required by regional/local laws and regulations.

Relationship to Local/Regional Policies

This Data Protection Policy is New Era's corporate policy. New Era Technology business units and/or subsidiaries may complement this with a local/regional data protection however, this Policy shall always be the minimum standard; a local/regional policy may augment, or increase the standards, but shall not detract from the New Era Technology data protection standards.

If any additional data protection policies are developed, Director of Governance, Risk and Compliance (GRC) must review and approve prior to release and publication.

3. Roles and Responsibilities

The Director of Governance, Risk and Compliance (GRC) and the Chief Technology Officer are responsible for the New Era Technology Security framework and its associated policies.

This Policy is reviewed annually by members of GRC. Any changes to this Policy will be approved by New Era Technology's Director of Governance, Risk, and Compliance prior to its release.

Suggestions for change to this Policy should be reported to GRC@neweratech.com.

All employees, contractors, vendors, service providers, and/or any other third parties processing personal data on New Era's behalf shall comply with applicable Data Protection Law in their respective jurisdictions.

Technology owners are responsible for technical standards applicable to their operating environments and domains.

Line managers have day-to-day responsibility for this policy, and employees should refer any questions about this policy to them in the first instance.

In line with their applicable solutions groups, New Era's business units shall develop, disseminate, and maintain formal, documented processes and/or procedures to facilitate the implementation of this Policy and, where applicable, any local/regional security or information security policies.

The processes and procedures shall be consistent with applicable laws, executive orders, directives, policies, regulations, and/or standards.

4. Policy

This Policy sets out New Era Technology' commitment to ensuring that any personal data, including special category personal data, which we process, is carried out in compliance with Data Protection Law.

We process personal data of individuals from all over the world, including the personal data of a large number of non-EU citizens, therefore we are committed to ensuring that all the personal data we process is undertaken in accordance with Data Protection Law. We will take steps to ensure that good data protection practice is embedded in the culture of our staff and throughout our organization.

The personal data that we process to provide our services relates to our employees, clients, partners and other individuals as necessary, including, partners, suppliers' staff and third parties.

This Policy covers information about:

- Data protection principles that we, New Era, must comply.
- What is personal data - which includes special category data (often referred to as sensitive data).
- How we collect, use and dispose of personal data in accordance with data protection principles.
- An individual's rights and obligations in relation to data protection.
- The consequences for any failure to act in accordance with this policy.

Our data protection policies and procedures include:

- Record of processing activities.
- Privacy notices.
- Personal data breach reporting process.
- Data retention policy.
- Data subject rights procedure.
- Data protection impact assessment process.
- Security policies.

Data Protection Principles

New Era complies with the data protection principles set out below. When processing personal data, it ensures that:

- It is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
- It is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').

- It is all accurate and, where necessary, kept up to date and that reasonable steps will 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 ('accuracy').
- It is 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 ('storage limitation').
- It is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

New Era will facilitate any request from a data subject who wishes to exercise their rights under Data Protection Law as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

Process / Procedures / Guidance

New Era will:

- Ensure that the legal basis for processing personal data is identified in advance and that all processing complies with applicable Data Protection Law. This may include processing based on:
 - **Consent**, where the individual has given clear, informed consent.
 - **Contractual necessity**, where the processing is necessary for the performance of a contract to which the data subject is a party.
 - **Legal obligation**, where processing is required to comply with a legal duty.
 - **Legitimate interests**, where the processing is necessary for the legitimate interests of New Era or a third party, provided such interests are not overridden by the fundamental rights and freedoms of the data subject.
 - **Vital interests**, where processing is necessary to protect the life of the data subject or another person.
 - **Public interest or official authority**, where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in New Era.
- Not process personal data in ways that are inconsistent with the purposes described in this policy or the applicable privacy notice.
- Ensure that appropriate privacy notices are in place advising employees, client and others of the legal basis for processing their data, how and why their data is being processed, and, in particular, the rights individuals have over their personal data.
- Only collect and process the personal data that it needs for purposes it has identified in advance; processing will be limited to the extent necessary to fulfill the specified, legitimate purposes.
- Ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible.

- Only hold onto personal data for as long as it is needed for the purposes for which it was collected, after which time such data will be securely erased, anonymized, or destroyed in accordance with the applicable data retention policy and legal requirements in each jurisdiction.
- Ensure that appropriate technical and organizational security measures are in place to ensure that personal data can only be accessed by those who need to access it for legitimate business purposes and that it is held and transferred securely.

We will ensure that all employees and other staff who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies, and that they are adequately trained and supervised.

Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of New Era's data protection policies may also be a criminal offence.

Data Subject Rights

New Era has processes in place to ensure that we can facilitate any request made by an individual to exercise their rights under Data Protection Law.

All requests will be considered without undue delay and within one month of receipt as far as possible.

Subject access: the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or which will be disclosed
- the retention period
- the right to lodge a complaint with the relevant regulatory authority.
- the source of the information if not collected direct from the subject, and
- the existence of any automated decision making

Rectification: the right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure: the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected, or
- where consent is withdrawn, or
- where there is no legal basis for the processing, or

- there is a legal obligation to delete data

Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:

- if the accuracy of the personal data is being contested, or
- if our processing is unlawful but the data subject does not want it erased, or
- if the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defense of legal claims, or
- if the data subject has objected to the processing, pending verification of that objection

Data portability: the right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller. This would only apply if New Era was processing the data using consent or on the basis of a contract.

Object to processing: the right to object to the processing of personal data relying on the legitimate interests processing condition unless New Era can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defense of legal claims.

Special Category Personal Data (often referred to as Sensitive Personal Data)

This includes the following personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person
- an individual's health
- a natural person's sex life or sexual orientation
- criminal convictions or offences

New Era processes special category data of our employees, clients and/or third parties as is necessary in circumstances where:

- Explicit consent has been given.
- The processing is necessary for the purposes of exercising the employment law rights or obligations of New Era or the individual.

- The processing is necessary to protect an individual's vital interests and is physically incapable of giving consent.
- Processing relates to personal data which are manifestly made public by the individual.
- The processing is necessary for the establishment, exercise or defense of legal claims.
- The processing is necessary for reasons of substantial public interest.

This Policy sets out the safeguards we believe are appropriate to ensure that we comply with the data protection principles set out above.

5. Compliance, Monitoring and Enforcement

This Policy is intended for all New Era businesses, in all countries.

New Era Technology seeks to proactively prevent and mitigate instances of non-compliance with this Policy.

Compliance is measured through various methods, including but not limited to risk assessments, business tool reports, internal and external audits, etc.

Any breaches or concerns, including ethical concerns or potential breaches in our commitment to information and data protection standards, should be reported as soon as possible through our Whistleblowing Policy.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to GRC@neweratech.com.

Any exception to this Policy must be approved by the New Era Technology's Chief Technology Officer, or delegate and / or Director of Governance, Risk, and Compliance in advance.

Personnel found to have intentionally violated this Policy may be subject to disciplinary action, up to and including termination of employment and other penalties as set forth herein. New Era Technology reserves the right to pursue any, and all, legal and civil action in connection with any such violation.

Any vendor, consultant, or contractor found to have violated this Policy may be subject to sanctions up to and including removal of access rights, termination of contract(s), and related civil or criminal penalties.

6. Acknowledgement

Those in receipt of this Policy acknowledge its receipt and understanding of its contents; and that New Era Technology expressly reserves the right to change, modify, or delete its provisions without notice.

Document Information

Reference	Privacy Framework
Title	Data Protection Policy
Purpose	The purpose of this policy is to provide information about data protection principles that we, New Era, must comply.
Owner	Governance, Risk & Compliance (GRC)
Document Approvers	Chief Technology Officer (CTO) Director of Governance, Risk & Compliance (GRC)
Intended Audience	New Era Technology management, personnel and interested parties.
Review Plan	Annually
Document Classification	Public

Document History

VERSION CONTROL			
Revision	Date	Record of Changes	Approved /Released By
V1.0	May 24, 2022	Approved release	GRCI Law, Dir GRC
V2.0	Jun 8, 2024	Reviewed	Dir GRC
V3.0	Sep 26, 2024	Annual review, updates to sections 2-6	Legal, Dir GRC
V3.0	Oct 22, 2024	Approved release	CTO, Dir GRC

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Document Ref.	Rev.	Uncontrolled Copy	X	Controlled Copy
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