

Limitless Lab

Confidentiality Policy

January 2023

Revision	Date	Purpose	Stakeholder
v. 1	2nd of January 2023	Confidentiality Policy	Committee

Table of Contents

Introduction..... 2

Scope..... 2

Confidential Information 2

 Confidentiality Requirements3

 Employees 3

 Third Parties 3

Data Handling Procedures 4

Enforcement 4

Review and Updates 4

Introduction

Confidentiality is fundamental to maintaining trust with our clients, protecting sensitive information, and complying with Spanish and European data protection laws. This policy outlines the requirements for confidentiality for all employees and third parties regarding data related to the company's clients.

Scope

This policy applies to all employees, contractors, consultants, vendors, and any other third parties who have access to or handle confidential information related to the company's clients, ensuring compliance with the General Data Protection Regulation (GDPR) and the Spanish Data Protection Act (LOPDGDD).

Confidential Information

Confidential information includes, but is not limited to:

LIMITLESS

- Personal data of clients (such as names, addresses, financial information, etc.)
- Intellectual property (trade secrets, proprietary algorithms, software code, etc.)
- Business plans and strategies
- Contracts and agreements
- Any other information deemed confidential by the company or its clients

Confidentiality Requirements

Employees

All employees must adhere to the following requirements:

- Treat all client-related information as strictly confidential, in compliance with GDPR and LOPDGDD.
- Access client information only on a need-to-know basis and for authorized purposes.
- Protect client data from unauthorized access, disclosure, alteration, or destruction.
- Use client information solely for legitimate business purposes and refrain from using it for personal gain or benefit.
- Maintain confidentiality when discussing client matters, whether in-person, over the phone, or electronically.
- Follow all company policies and procedures related to data protection and confidentiality.
- Report any suspected breaches of confidentiality to the Data Protection Officer (DPO) or the appropriate authority immediately.

Third Parties

Third parties must:

- Sign a data processing agreement or adhere to the terms outlined in contracts or agreements before accessing client-related information.
- Use client information solely for the purpose specified in the agreement and refrain from disclosing it to unauthorized parties.

LIMITLESS

- Implement appropriate security measures to protect client data from unauthorized access, disclosure, or misuse, as required by GDPR and LOPDGDD.
- Comply with all applicable laws and regulations governing the protection of client information.
- Report any security incidents or breaches involving client data to the company's DPO or the appropriate authority immediately.

Data Handling Procedures

To ensure compliance with data protection laws, the following procedures must be followed:

- Client data should be stored securely using encryption and access controls, in accordance with GDPR and LOPDGDD requirements.
- Transmission of client data should be encrypted to prevent interception and comply with GDPR standards.
- Client data should only be shared with authorized individuals on a need-to-know basis, and explicit consent should be obtained when necessary.
- Client data should be securely disposed of when no longer needed, following GDPR and LOPDGDD guidelines.

Enforcement

Failure to comply with this confidentiality policy may result in disciplinary action, in accordance with GDPR and LOPDGDD, up to and including termination of employment or contract. Violations may also lead to legal action and significant fines under GDPR.

Review and Updates

LIMITLESS

This policy will be reviewed periodically and updated as necessary to ensure compliance with changes in Spanish and European data protection laws. Employees and third parties are responsible for staying informed about any revisions to the policy.

By adhering to this confidentiality policy, employees and third parties contribute to maintaining trust with our clients and ensuring compliance with data protection regulations.