



ATNIS Privacy Policy

This policy sets out our commitment to creating a workplace where every individual feels valued, empowered, and heard.





Table of Contents

Introduction	Page 03
Definitions	Page 04
Privacy Principles	Page 04
Individual Rights	Page 06
Collection of Personal Data	Page 06
Use of Personal Data	Page 06
International Data Transfers	Page 07
Data Retention and Disposal	Page 07
Data Breach Management	Page 07
Privacy Governance and Accountability	Page 07
Training and Awareness	Page 08
Compliance and Monitoring	Page 08
Contact Information	Page 08
Changes to this policy	Page 08
Conclusion	Page 09



Introduction

ATNIS (including its subsidiaries, affiliates, and branch offices, collectively referred to as “ATNIS”, “we”, “our”, or “us”) is committed to protecting the privacy, confidentiality, and security of personal data and ensuring compliance with applicable data protection and privacy laws in all jurisdictions where it operates.

This Privacy Policy (“Policy”) defines the principles, standards, and practices governing the collection, processing, storage, use, disclosure, and protection of personal data (“Personal Data”), including sensitive personal data, relating to employees, contractors, customers, clients, business partners, vendors, and other stakeholders (“Individuals”).

This Policy applies to:

- All ATNIS employees (full-time, part-time, and temporary).
- Contractors and consultants.
- Third-party service providers and partners.

ATNIS requires all third parties handling Personal Data on its behalf to comply with equivalent data protection obligations through legally binding agreements and due diligence processes.





Definitions

For the purpose of this Policy:

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Sensitive Personal Data:** Personal Data that requires enhanced protection (e.g., health data, financial information, biometric data, or other data as defined by applicable law).
- **Processing:** Any operation performed on Personal Data, including collection, storage, use, transmission, disclosure, or deletion.
- **Data Subject / Individual:** The person to whom the Personal Data relates.

Privacy Principles

ATNIS processes Personal Data in accordance with the following core principles:

Lawfulness, Fairness, and Accountability

ATNIS ensures that Personal Data is processed:

- Lawfully, fairly, and in a transparent manner.
- Based on valid legal grounds such as consent, contractual necessity, legal obligation, or legitimate interest.
- With accountability mechanisms to demonstrate compliance.

Purpose Limitation

Personal Data is collected for:

- Specific, explicit, and legitimate purposes.
- Not further processed in a manner incompatible with those purposes.
- Any secondary use will require appropriate legal justification or consent.

Data Minimization

ATNIS limits Personal Data collection to:

- What is directly relevant and necessary.
- The minimum required to achieve business or legal objectives.

Accuracy

ATNIS takes reasonable steps to ensure:

- Personal Data remains accurate and up to date.
- Inaccurate or incomplete data is corrected or deleted promptly.
- Individuals are encouraged to actively update their information where applicable.



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- Personal Data remains accurate and up to date.
- Inaccurate or incomplete data is corrected or deleted promptly.

Individuals are encouraged to actively update their information where applicable.

Storage Limitation

Personal Data is retained:

- Only for as long as necessary for the intended purpose.
- In accordance with legal, regulatory, and contractual retention requirements.

Secure disposal or anonymization is performed once data is no longer required.

Security and Confidentiality

ATNIS implements a risk-based approach to security, including:

- Encryption and secure data transmission.
- Access control and identity management.
- Network and system security measures.
- Physical security safeguards.

These controls are designed to prevent unauthorized access, alteration, disclosure, or destruction of Personal Data.

Privacy by Design and Default

ATNIS integrates privacy into:

- System architecture and software development lifecycles.
- Business processes and workflows.
- Procurement and vendor onboarding.

Default settings ensure that only necessary Personal Data is processed.

Controlled Disclosure

ATNIS discloses Personal Data only:

- To authorized recipients.
- For defined and legitimate purposes.
- Under appropriate confidentiality and data protection agreements.
- When required by law, regulation, or legal process.



Individual Rights

Subject to applicable laws, Individuals have the right to:

- Access their Personal Data and obtain a copy.
- Request correction of inaccurate or incomplete data.
- Request deletion or restriction of processing.
- Object to processing based on legitimate interests.
- Withdraw consent where processing is based on consent.
- Request transfer of data in a structured, commonly used format (data portability).

ATNIS maintains processes to:

- Verify identity before fulfilling requests.
- Log and track requests to completion.
- Respond within legally prescribed timelines.

Collection of Personal Data

ATNIS may collect Personal Data:

- Directly from Individuals (e.g., forms, contracts, communications).
- Indirectly from third parties (e.g., partners, service providers, public sources).
- Through digital interactions (e.g., websites, applications, cookies where applicable)

ATNIS ensures that Individuals are informed about:

- The nature of data collected.
- The purpose of collection.
- Any third parties involved.

Use of Personal Data

Personal Data may be used for:

- Service delivery and business operations.
- Contract management and customer support.
- Human resource management.
- Legal and regulatory compliance.
- Risk management and fraud prevention.
- Improvement of services, systems, and user experience.



International Data Transfers

Given its global operations, ATNIS may transfer Personal Data across borders.

ATNIS ensures that:

- Transfers comply with applicable data protection laws.
- Adequate safeguards are implemented (e.g., contractual clauses, adequacy decisions).
- Data protection standards equivalent to this Policy are maintained.

Data Retention and Disposal

ATNIS maintains data retention schedules that define:

- Retention periods for different categories of Personal Data.
- Legal and regulatory requirements for retention.

Upon expiry of retention periods, Personal Data is:

- Securely deleted.
- Anonymized or de-identified where appropriate.

Data Breach Management

ATNIS has established procedures for identifying, reporting, and managing data breaches.

In the event of a breach:

- Incidents must be reported immediately.
- Investigations are conducted promptly.
- Mitigation actions are implemented.
- Notifications are made to regulators and affected Individuals where required.

Privacy Governance and Accountability

ATNIS maintains a robust privacy governance framework, including:

- Appointment of a Privacy Officer or Data Protection Officer (DPO).
- Defined roles and responsibilities across business units.
- Regular risk assessments and privacy impact assessments.

The privacy function is responsible for:

- Monitoring compliance.
- Advising on data protection obligations.
- Managing privacy incidents and requests.



Training and Awareness

ATNIS conducts regular training programs to ensure:

- Employees understand privacy obligations.
- Risks related to Personal Data are identified and mitigated.
- Best practices in data handling are followed.

Compliance and Monitoring

ATNIS ensures compliance with this Policy through:

- Internal audits and reviews.
- Continuous monitoring of systems and processes.
- Adoption of recognized industry standards and frameworks.
- Non-compliance may result in disciplinary action and/or legal consequences.

Contact Information

For any questions, concerns, or requests related to this Policy or Personal Data, Individuals may contact:

Privacy Officer

ATNIS

Email: privacy@atnis.net (placeholder)

Changes to this Policy

ATNIS may update this Policy periodically to reflect:

- Changes in applicable laws or regulations.
- Technological advancements.
- Updates to business practices.

The latest version will be made available through official communication channels.



Conclusion:

ATNIS is firmly committed to protecting the privacy, confidentiality, and security of personal and business information across all its operations. This Privacy Policy establishes the principles and practices that guide how we collect, use, store, and safeguard data, ensuring compliance with applicable regulations and industry standards.

It provides a clear framework for responsible data handling, ensuring that all activities align with our core values of integrity, transparency, and accountability. Every employee and stakeholder shares responsibility in maintaining the highest standards of data protection and respecting the privacy rights of our clients, partners, and communities.

Our reputation is built on trust, and that trust depends on how responsibly we manage sensitive information. Through consistent adherence to this Privacy Policy, we reinforce confidence in our services and demonstrate our commitment to ethical and secure data practices.








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