

ELA'S DATA PROTECTION TRAINING POLICY**1. Scope**

This Policy applies to Epure, Lizac si Asociatii SCA ("ELA")'s training and awareness programme concerning its compliance with the GDPR and with relevance for any other matters relating to data protection and privacy.

2. Training policy

- 2.1 The Managing Partner assigns data protection responsibilities to employees in relation to ELA's policies and procedures on personal data management.
- 2.2 The Managing Partner shall ensure that all employees/collaborators with day-to-day responsibilities involving personal data and processing operations, and those with permanent/regular access to personal data, demonstrate compliance with the GDPR.
- 2.3 These employees/collaborators shall be able to demonstrate competence in their understanding of the GDPR and the manner in which GDPR is practised and implemented throughout ELA.
- 2.4 The Managing Partner ensures that the employees are kept up to date and informed of any issues related to personal data.
- 2.5 The Managing Partner shall promote training and awareness programmes, and ELA shall make resources available in order to raise awareness. The Managing Partner shall demonstrate and communicate to employees the importance of data protection in their role and ensure that they understand how and why personal data is processed in accordance with ELA's policies and procedures.
- 2.6 The Managing Partner ensures that all security requirements related to data protection are demonstrated and communicated to employees to the same affect.
- 2.7 ELA's employees/collaborators shall be provided with specific training on processing personal data relevant to their individual day-to-day roles and responsibilities, and in accordance with ELA's policies and procedures.
- 2.8 Employees/collaborators shall be provided with specific training on any information security requirements and procedures applicable to data protection and the data processing within their individual day-to-day roles and responsibilities, including reporting personal data breaches.

DATA PROTECTION GOVERNANCE DOCUMENTS

- 2.9 Employees/collaborators shall be provided with training on dealing with complaints relating to data protection and processing personal data.
- 2.10 HR Department of ELA shall keep records of the relevant training undertaken by each person who has this level of responsibility.
- 2.11 The Managing Partner and HR Department are responsible for organising relevant training for all responsible individuals and employees/collaborators generally, and for maintaining records of the attendance of staff at relevant training at appropriate times across ELA's business cycle.

Document Owner and Approval

The Managing Partner is the owner of this document and shall ensure that it is kept up to date. A current version of this document is available to all members of staff on ELA's website on page "Data Protection", section "Policies & Procedures". This policy was approved by Decision of Partners on 15.02.2018 and is issued under the signature of the Managing Partner.

Signature: Doru Epure – Managing Partner

Date: 15.02.2018