

# Data Protection at work

## How to keep information safe

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HARVEST

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# Introduction

- **This Bulletin** is the fourth in a series of editorials aimed at raising awareness on data protection matters. They will serve as a reminder to help avoid data breaches that can profoundly damage the reputation of Harvest Technology or its subsidiaries.
- At Harvest Technology, we all handle personal data every day. **How secure do we keep it?** Mismanagement can lead to financial loss, fines, lawsuits, and reputational damage.
- Research shows that in 2024, **67%** of data was lost through unintended human error rather than criminal or malicious acts. This percentage increased to 74% in 2025. As of mid-2025, data breaches have increased by approximately 11% compared to the same period in 2024. These figures are significant which is why it's essential for all employees to understand how to handle data correctly and responsibly.

# The proper handling of E-mails and Mail

DO's	WHY
<p>Check attachments containing personal data before sending by e-mail.</p>	<p>To ensure that you share the correct data both with external parties as well as with colleagues.</p>
<p>Double-check the recipient(s) before sending out an e-mail. Always check all recipients especially when using the 'Reply all' function and ensure that the recipients are correct and in the correct 'To/Cc/Bcc' section. Be careful of 'auto complete' when selecting addresses as it is very easy to select the wrong person with the same name.</p>	<p>Many data breaches occur due to e-mails being sent to the incorrect recipient.</p>
<p>Password protect spreadsheets containing bulk confidential data being sent internally to colleagues by e-mail.</p>	<p>Password protection ensures that if an e-mail is sent erroneously to an external recipient instead of an internal colleague the external recipient cannot access the data in the document without having access to the password.</p>
<p>Double-check the recipient details before sending out any postal mail.</p>	<p>Ensure that envelopes and their content do not get mixed up when sending out physical mail. If possible, also ensure that the address is correct since customers can move residence.</p>

# 01 Standard Contractual clauses

The EU introduced **Standard Contractual Clauses** (SCCs) to ensure lawful, secure data transfers outside the EU under General Data Protection Regulation (GDPR). SCC's offer key compliance and business benefits.

## Scope:

1. SCCs provide a lawful mechanism for transferring personal data from the EU/EEA to countries without an adequacy decision (explained in slide 6) under the GDPR.
2. They ensure that EU citizens' data remains protected even when processed in jurisdictions with weaker privacy laws.
3. By offering pre-approved clauses, the EU simplifies compliance for businesses operating internationally.

## 02 Key benefits when using SCC's

1. SCCs help organizations meet GDPR requirements for international data transfers, reducing risk.
2. They facilitate cross-border operations by providing a clear framework for data sharing with partners outside the EU.
3. SCCs offer a standardized, recognized approach that regulators and courts understand and accept.
4. They include modular clauses tailored to different transfer scenarios (e.g., controller-to-controller, processor-to-processor), making them more adaptable.
5. SCCs include obligations for the receiver of the data to notify the sender of the data of any legal conflicts encountered and to implement safeguards, enhancing accountability.

## 03 Adequacy Decisions

- An adequacy decision is a formal ruling by the European Commission that determines whether a non-EU country offers an adequate level of data protection comparable to that of the European Union under the GDPR.
- In 2025, the European Commission has granted adequacy decisions to 15 countries and territories, allowing seamless personal data transfers from the EU without additional safeguards.
- The benefits of Adequacy Decisions are:
  1. Simplified compliance for businesses transferring data internationally.
  2. Reduces legal and administrative burden as there is no need for extra contracts or assessments.
  3. Boosts trust and cooperation between the EU and third countries.

# 04 Help & Support

Your Data Protection Officer is available to provide guidance on keeping data safe and secure.

If you experience a data breach affecting confidentiality, availability, or integrity of personal data, report it immediately to the Data Protection Officer via the following emails - no later than the close of business on the same day:

[dataprivacy@harvest.tech](mailto:dataprivacy@harvest.tech)

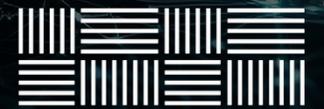
[dataprivacy@ptl.com.mt](mailto:dataprivacy@ptl.com.mt)

[dataprivacy@apcopay.com](mailto:dataprivacy@apcopay.com)

[dataprivacy@apco.tech](mailto:dataprivacy@apco.tech)



Thank you



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