

## Standard Contractual Clauses (SCCs)

**Note for OTG Master File:** *The core text of the SCCs is legally "fixed" by the UK ICO and European Commission. You cannot change the wording of the clauses themselves, but you must complete the **Annexes** below, which define OTG's specific operations.*

### Annex I: List of Parties & Description of Transfer

- **A. List of Parties:**
  - **Data Exporter:** [The Client Name], located in the UK/US.
  - **Data Importer:** Olympus Tech Global (OTG), Lahore, Pakistan.
- **B. Description of Transfer:**
  - **Categories of Data Subjects:** Customers, employees, and end-users of the Client.
  - **Categories of Personal Data:** Names, contact details, operational logs, and communication history.
  - **Frequency of Transfer:** Continuous/Real-time (24/7/365).
  - **Nature of Processing:** Execution of BPM and CX tasks, including coordination, support, and administrative management via client-hosted platforms.
- **C. Competent Supervisory Authority:**
  - For UK Transfers: The Information Commissioner's Office (ICO).

### Annex II: Technical & Organizational Measures

This is the most critical section for your client's audit. We are documenting the "Neutral & Global" security standards we discussed:

1. **Pseudonymization & Encryption:** All data in transit is protected via **TLS 1.3**. All endpoint devices utilize **AES 256-bit** full-disk encryption.
2. **Confidentiality:** Every OTG employee has signed a legally binding **Acceptable Use Policy (AUP)** and a Non-Disclosure Agreement (NDA).
3. **Physical Security:** The Lahore facility features biometric access, 24/7 CCTV, and a **"Clean Desk" protocol** (no personal devices allowed).
4. **Network Integrity:** Operations are restricted to **Whitelisted Static IPs**. No unauthorized VPNs or tunneling software are permitted.
5. **Governance:** Annual internal audits and a mandatory **48-hour Breach Notification** protocol.

### Annex III: List of Sub-processors

- **Current Status:** OTG does not utilize third-party sub-processors. All processing is conducted by OTG-employed staff.