

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.