

PHOENIX BEVERAGES LIMITED

TRAINING POLICY

1. Introduction

- 1.1 In this Training Policy, 'PBL' refers to Phoenix Beverages Limited and all the words and expressions used in this Training Policy shall be interpreted and construed in line with the definitions used in PBL's General Data Protection Policy.
- 1.2 This Training Policy should be read and interpreted in conjunction with and subject to PBL's General Data Protection Policy that governs all the personal data processing activities of PBL.
- 1.3 This Training Policy applies to PBL's training and awareness programme where relevant to the GDPR and the DPA, compliance with the GDPR, and other matters relating to data protection and privacy.
- 1.4 PBL will retain evidence of its compliance with the GDPR and the DPA, and will record and monitor its employees' training in respect of data protection and privacy.
- 1.5 PBL will ensure that its employees understand the risks to PBL (both financial and reputation) as well as the risk to themselves (potential disciplinary issues, dismissal or redundancy in case of a data breach).
- 1.6 At PBL, we believe that when the risks are combined with the need to protect individual's data and information, employees can then start to understand the significance of data protection laws, the care they need to take in handling personal data, why there are certain policies and procedures in place and, most importantly, why they must comply with those policies.

2. Training policy

- 2.1 PBL assigns data protection responsibilities to employees of PBL in relation to PBL's policies and procedures on personal data management.
- 2.2 PBL assigns all staff responsibilities for the GDPR and the DPA; and ensures that it is in either their job descriptions or the written instructions given to them in the course of their contracts of employment with PBL. PBL ensures that its employees receive induction training and ongoing updated training to furnish them with the knowledge and awareness needed for this responsibility. The level of responsibility will depend on the role within PBL.
- 2.3 PBL shall ensure that all its employees 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 and the DPA.
- 2.4 PBL ensures that these employees are kept up to date and informed of any issues related to personal data.
- 2.5 The Management of PBL is committed to promoting training and awareness programmes, and undertake to make resources available in order to raise such awareness.

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- 2.6 The Data Protection Officer of PBL shall demonstrate and communicate to PBL's employees the importance of data protection in their role and ensure that they understand how and why personal data is processed in accordance with PBL's policies and procedures.
- 2.7 The Data Protection Officer of PBL will ensure that all security requirements related to data protection are demonstrated and communicated to PBL employees to the same affect.
- 2.8 PBL employees are provided with specific training on processing personal data relevant to their individual day-to-day roles and responsibilities, and in accordance with PBL's policies and procedures.
- 2.9 PBL employees are 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.
- 2.10 Employees of PBL are also provided with training on dealing with complaints relating to data protection and processing personal data.
- 2.11 The Training and/or HR Department of PBL, in collaboration with the Data Protection Officer of PBL, is are responsible for organising relevant training for all responsible individuals and employees generally, and for maintaining records of the attendance of staff at relevant training at appropriate times across PBL's business cycle.

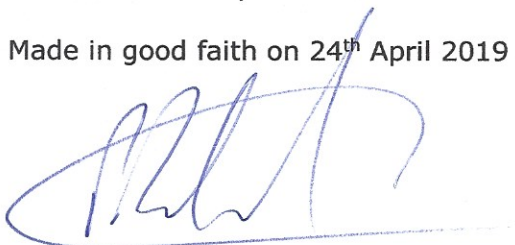
Document Owner and Approval

Phoenix Beverages Limited is the owner of this document.

This document may, from time to time, be reviewed in line with any changes in the PBL's General Data Protection Policy and the law.

This Training Policy been duly approved by the Management of Phoenix Beverages Limited on 24th April 2019.

Made in good faith on 24th April 2019 at Pont Fer, Phoenix, Republic of Mauritius.



Mr. Patrick RIVALLAND
Chief Finance Officer/Chief Operating Officer
Phoenix Beverages Limited