Policy name: Data Privacty & Digital Waste Management	Approved by: Mr. Mostafa El Naby
Policy number: 4	**Issued date:**

<h2 style="background-color:#22b14c;color:white;padding:4px">1-Policy statement</h2>

At Baramouda, data is more than a record, it is proof of our impact. Our **digital waste management platform** serves as the backbone of our operations, enabling us to accurately track organic waste from collection to transformation, while quantifying the environmental and social benefits generated.

Every waste supplier in our network registers their branches, inputs waste quantities, and gains access to a **comprehensive impact dashboard**. This dashboard translates operational data into measurable sustainability results across two key dimensions:

- **Environmental Impact** – Total Waste Collected (kg), Total Fertilizer Produced (kg), Water Resources Saved (L), and CO_2 Emissions Reduced (kg).

- **Sustainable Environmental Performance Indicators** – Trees Planted, CO_2 Absorbed (kg), and People Sustained by Oxygen.

This process ensures that every stakeholder from farmers and factories to commercial partners can clearly see their direct contribution to the circular economy and climate action in Egypt.

Baramouda treats all data entrusted to us, including supplier details, branch information, waste volumes, and impact metrics with the highest level of confidentiality and integrity. We are committed to:

- Secure data storage.

- Controlled access based on operational need.

- Compliance with Egyptian data protection regulations and internationally recognized privacy standards.

By combining accurate data recording with transparent impact measurement, Baramouda not only protects sensitive information but also builds trust through credible, results-driven reporting. Our platform transforms waste collection into **tangible, trackable, and impactful outcomes**, reinforcing our leadership in sustainable waste management.

2-Policy scope

This Data Privacy & Digital Waste Management Policy applies to all activities, users, and processes involving the collection, storage, processing, and reporting of data within Baramouda's digital waste management platform.

It covers:

- **Data Sources**: Information provided by waste suppliers, including branch registrations, contact details, waste type, and quantity records.

- **Impact Measurement Data**: All metrics generated by the platform, including Environmental Impact (Total Waste Collected, Total Fertilizer Produced, Water Resources Saved, CO_2 Emissions Reduced) and Sustainable Environmental Performance Indicators (Trees Planted, CO_2 Absorbed, People Sustained by Oxygen).

- **System Users**: All Baramouda employees, contractors, and authorized waste supplier representatives who enter, process, or view platform data.

- **Geographical Coverage**: All waste data collected from operations in Egypt and any future international expansion.

- **Data Management Processes**: Recording, storing, analyzing, and reporting data; controlling access permissions; securing platform infrastructure; and publishing aggregated impact results.

- **Stakeholders**: Waste suppliers, farmers, industrial partners, government agencies, and other entities that access or receive reports derived from the platform.

By defining this scope, Baramouda ensures that the protection, integrity, and responsible use of operational and impact data are embedded into every stage of our digital waste management process.

3-Policy objectives

The purpose of this policy is to ensure that Baramouda's digital waste management platform operates with the standards of data protection, accuracy, and transparency, while providing meaningful environmental impact insights to our partners. Specifically, our objectives are to:

1. **Safeguard Sensitive Information**

   o Protect all supplier, branch, and operational data through secure storage, and controlled access.

- Ensure compliance with Egyptian data protection laws and relevant international privacy standards.

2. **Ensure Data Accuracy and Integrity**

- Maintain complete and accurate records of waste quantities, sources, and related operational data.

- Translate operational data into measurable sustainability outcomes, including Total Waste Collected, Total Fertilizer Produced, Water Resources Saved, CO_2 Emissions Reduced, Trees Planted, CO_2 Absorbed, and People Sustained by Oxygen.

- Deliver platform-based impact reports that enable waste suppliers and partners to see their contribution to the circular economy and climate action.

3. **Promote Transparency and Accountability**

- Share aggregated environmental impact results with stakeholders through reports, dashboards, and other communication channels.

- Use platform data to support Baramouda's sustainability reporting.

4. **Support Decision-Making and Continuous Improvement**

- Use platform analytics to identify trends, improve collection and processing efficiency, and expand waste recovery.

- Provide partners with insights to help them improve their own sustainability performance.

5. **Maintain System Security and Resilience**

- Ensure that all system backups and disaster recovery protocols are in place and tested.

4- Key policy pillars & implementation areas

Pillar 1 – Data Protection and Confidentiality

Implementation Areas:

- Store all supplier, branch, and waste quantity data in secure servers with control access.

- Limit access to authorized personnel only, based on operational need.

- Require confidentiality agreements for employees and partners handling sensitive data.

Pillar 2 – Data Accuracy and Integrity

Implementation Areas:

- Require complete and correct information when suppliers register branches and record waste quantities.
- Conduct periodic audits of platform data to ensure accuracy and consistency.

Pillar 3 – Impact Measurement and Reporting

Implementation Areas:

- Convert waste quantity data into measurable sustainability results: Total Waste Collected, Total Fertilizer Produced, Water Resources Saved, CO_2 Emissions Reduced, Trees Planted, CO_2 Absorbed, and People Sustained by Oxygen.
- Provide each supplier with access to their own impact dashboard to visualize contributions.
- Aggregate data to support Baramouda's overall sustainability and circular economy reporting.

Pillar 4 – Transparency and Partner Engagement

Implementation Areas:

- Share impact reports with suppliers, farmers, and partners to demonstrate the environmental benefits of their contributions.
- Publish selected aggregated results in Baramouda's annual sustainability report.
- Use the platform as a tool to educate and encourage suppliers to increase waste recovery efforts.

Pillar 5 – System Security and Resilience

Implementation Areas:

- Maintain up-to-date cybersecurity measures, including firewalls, intrusion detection, and encrypted connections.
- Implement regular data backups and secure storage for disaster recovery.
- Test system recovery protocols to ensure minimal disruption in case of outages or incidents.

5- Roles & Responsibilities

The effective implementation of this policy relies on the shared commitment of Baramouda's teams, waste suppliers, and authorized partners to protect data integrity and deliver accurate environmental impact reporting.

1. Management

- Approve and oversee the implementation of this policy.
- Allocate resources for platform security, data protection measures, and system improvements.
- Review and approve impact reporting derived from platform data.

2. Data & Reporting Team

- Maintain the accuracy and completeness of all records within the platform.
- Ensure that environmental impact calculations (e.g., CO_2 reductions, water savings) are based on consistent and reliable methodologies.
- Prepare aggregated data for sustainability reports and partner communications.

3. Technical Service Providers

- Provide platform hosting, maintenance, and security updates.
- Manage system backups, access controls, and any required disaster recovery protocols.
- Implement cybersecurity protections, including encryption, firewalls, and intrusion prevention.
- Coordinate with Baramouda's Data & Reporting Team to resolve technical issues promptly.

4. Waste Collection & Operations Team

- Accurately record waste quantities collected from suppliers and partners.
- Verify that data entered into the platform matches physical records and collection logs.
- Report any discrepancies or data anomalies to the Data & Reporting Team.

5. R&D and Innovation Team

- Analyze platform data to identify trends and opportunities for process or product innovation.
- Support the development of new impact measurement methodologies when needed.

6. All Employees with Platform Access

- Use login credentials responsibly and maintain the confidentiality of all accessed data.

- Follow established protocols for entering, reviewing, and sharing platform information.
- Immediately report any suspected data breaches or unauthorized access attempts.

7. Waste Suppliers & Partners

- Provide accurate, timely data when registering branches and recording waste quantities.
- Review and confirm their own impact dashboard data regularly.
- Collaborate with Baramouda to correct any inaccuracies or inconsistencies.

6-Monitoring, Evaluation and Reporting

Baramouda monitors and evaluates the performance of its digital waste management platform to ensure data accuracy, security, and the delivery of meaningful environmental impact insights.

1. Monitoring

- Track all data entries from waste suppliers, including branch registrations and waste quantity submissions.

- Monitor platform-generated environmental and sustainability indicators for accuracy.

- Maintain logs of platform access and changes to ensure accountability and traceability.

- Review security measures in coordination with external technical service providers to identify and address vulnerabilities.

2. Evaluation

- Conduct quarterly reviews of platform data to check for inconsistencies, missing records, or anomalies.

- Assess the accuracy of environmental impact calculations against agreed methodologies.

- Evaluate partner participation rates and quality of data input to identify improvement opportunities.

- Analyze trends in waste recovery and impact metrics to inform operational and strategic decisions.

3. Reporting

- Generate regular impact reports for waste suppliers, showing their contribution in terms of Total Waste Collected, Total Fertilizer Produced, Water Resources Saved, CO_2 Emissions Reduced, Trees Planted, CO_2 Absorbed, and People Sustained by Oxygen.

- Produce internal performance summaries for management review, highlighting progress toward Baramouda's environmental goals.

- Integrate aggregated platform data into Baramouda's annual sustainability report for public disclosure.

- Share relevant findings with partners and stakeholders to encourage increased waste recovery and participation.

7- Review & Update Cycle

Baramouda is committed to keeping this policy up-to-date with evolving data protection regulations, technological developments, and operational needs.

- **Annual Review**: Management will review this policy once every 12 months to ensure it remains aligned with Egyptian data protection laws, international privacy standards, and Baramouda's operational requirements.

- **Interim Updates**: Updates will be made immediately if there are significant changes in regulations, platform functionality, or data security requirements.

- **Stakeholder Feedback**: Input from waste suppliers, partners, and employees will be considered when revising this policy to ensure practical and effective implementation.

- **Communication of Updates**: Any revisions will be communicated internally to all employees and externally to relevant partners. Updated versions will be published on Baramouda's official website.

8- Alignment with international standards

Baramouda's approach to data privacy and digital waste management aligns with recognized global frameworks and best practices to ensure credibility, compliance, and stakeholder trust.

- **ISO 14001 – Environmental Management Systems**: Leveraging accurate environmental data to improve sustainability performance.

- **ISO 9001 – Quality Management Systems**: Ensuring the accuracy, reliability, and consistency of data-driven processes.

- **Egyptian Data Protection Law**: Full compliance with national regulations governing the handling, storage, and processing of personal and operational data.

- **General Data Protection Regulation (GDPR) Principles**

- **UN Sustainable Development Goals (SDGs)**: Supporting SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action) by using data to track and scale environmental impact.

At Baramouda, protecting data privacy and delivering accurate environmental impact reporting are inseparable from our mission to drive the circular economy. Our digital waste management platform transforms waste collection records into measurable sustainability outcomes, empowering suppliers, partners, and communities to see their real contribution to climate action.

We are committed to safeguarding sensitive information, maintaining the integrity of our platform, and using data to inspire change. By combining secure systems, transparent reporting, and actionable insights, Baramouda ensures that every recorded kilogram of waste leads to a cleaner environment, healthier soils, and a stronger future for the planet.