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1. **"ICAS"** includes ICAS International Holdings including ICAS Gulf (branch), ICAS Spain (affiliated subsidiary), ICAS Southern Africa (subsidiary) and designated third parties ("Group Members").
 2. **"Processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
 3. **"Personal data" / "Personal information"** means any information relating to an identified or identifiable natural person ("**Data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
 4. **"Sensitive personal data"** means "special categories of personal data" as set out in GDPR and POPIA, which must be treated with extra security. These categories include health information and also genetic data and biometric data where processed to uniquely identify an individual. Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing.
 5. For the purpose of this Policy, reference to Europe means the EEA and Switzerland.
 6. This policy is drafted in the English language only.