GDPR Compliance Policy Summary

*Xyberteq Innovations Sdn. Bhd. | Company No: 201701035190 (1249361-M)*

*No.14, Persiaran Damansara Endah, Damansara Endah, Damansara Heights, 50490 Kuala Lumpur, Malaysia*

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# Scope & Products

This policy summarises GDPR governance across Sentient Spire QCS™ (core platform), Sentient Spire Advisory, Sentient Spire Exposure Intelligence, Sentient Spire Mobile Solution.

# Roles

Controller: Xyberteq Innovations Sdn. Bhd.. Processor: As applicable per client engagement. DPO: appointed by this letter. EU Representative: «Insert Provider: EDPO / DataRep / The DPO Centre», Registered Address, Contact Email (to be confirmed).

# Framework

Policies & procedures mapped to GDPR Articles; integration with ISO 27001 management system; annual reviews.

# Key Controls

Access control & MFA; encryption; logging & monitoring; incident response; data retention; vendor due diligence; DSAR workflow; training.

# Records

ROPA, SAR tracker, vendor DPA repository, SCC annexes, management review minutes.

# Review Cycle

Annual review or after major changes; evidence stored in compliance repository.