



POLICY - PRIVACY

Policy Title:	New Heights Privacy Policy	Department:	Information Technology (Operations)
Effective Date:	April 17, 2026	Policy ID:	ITPrivacy_01_NHPolicy
Contact:	Director, Information Technology	Revision Number:	01

POLICY OVERVIEW

Policy Description

This policy defines the goal and reason for protecting personal data at New Heights, ensuring all organizational activities align with legal requirements and ethical data practices.

Policy Statement

New Heights is committed to a 'Privacy by Design' (PbD) approach. Privacy by Design embeds data protection into the development of systems, products, and processes from the very beginning. It ensures that user privacy is the default, using data minimization and proactive measures to prevent privacy breaches. To maintain the integrity and confidentiality of all data subjects, the following expanded standards are mandated:

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully and fairly. We will maintain clear, accessible notices explaining what data is collected and why.
- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and will not be further processed in a manner incompatible with those purposes.
- **Data Accuracy:** Every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay.
- **Storage Limitation:** Personal information will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and Confidentiality:** We utilize encryption, access controls, and regular audits to ensure appropriate security, including protection against unauthorized or unlawful processing and against accidental loss or destruction.



- **Accountability:** New Heights shall be responsible for, and demonstrate compliance with, these principles through internal monitoring and documentation.

Definitions & Related Documents

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Subject:** The individual to whom the personal data relates.
- **Privacy Impact Assessment (PIA):** A process used to identify and reduce the privacy risks of entities.