

# EUCare Portal Privacy Policy

**Effective Date:** 16 June 2025

**Last Updated:** 16 June 2025

## 1. Introduction

The EUCare Portal is a digital platform developed under the Brunei Shell Joint Venture (BSJV) EUCare initiative to enhance service delivery, user engagement, and support operations. This Privacy Policy outlines how your personal data is collected, used, disclosed, stored, and protected in compliance with the **Personal Data Protection Order (PDPO), 2025**, and the **Brunei Government Data Protection Policy v2.2**.

## 2. Scope

This policy applies to all users of the EUCare Portal including BSJV employees, contractors, vendors, and authorized third parties accessing the system via web, mobile, or integration interfaces.

## 3. Types of Personal Data Collected

EUCare collects only the minimum necessary personal data for operational, security, and user support purposes, including:

- Full name, identification number, role, department
- Contact information (email, phone number)
- Login history, IP address, device information
- Interaction logs (e.g. support tickets, chat messages)

## 4. Purpose of Data Collection and Use

Personal data is collected and used for the following lawful and legitimate purposes:

- Account provisioning, authentication, and access management
- Handling IT support requests and reset password functions
- Monitoring service usage, diagnosing technical issues
- System performance, security incident tracking and audit compliance

## 5. Consent and Notification

By using the EUCare Portal, you provide deemed consent to the collection, use, and disclosure of your personal data as outlined herein, in accordance with PDPO Sections 8 to 12. Explicit consent will be obtained where required by law, and you may withdraw consent by submitting a written request, subject to legal and service constraints.

## 6. Disclosure of Personal Data

Your data may be disclosed to:

- Designated EUCare administrators and support teams
- Regulatory or law enforcement agencies when required by law
- Contracted service providers and processors bound by data protection obligations

We do not sell, trade, or transfer your personal data to external third parties without legal basis.

## 7. Data Retention and Disposal

Personal data is retained only as long as necessary to fulfill operational or legal purposes. Logs and records associated with user activity and support interactions are archived securely and disposed of in accordance with data retention schedules approved under PDPO Section 23.

## 8. Data Protection and Security Measures

EUCare is committed to implementing robust data protection controls, including:

- Encryption of data in transit and at rest
- Role-based access control and audit trails
- Endpoint security, vulnerability patching, and monitoring
- Incident response protocols as per PDPO Sections 26–28 (Data Breach Notification)

Staff are regularly trained on data protection awareness and responsibilities.

## 9. Cross-Border Data Transfers & Microsoft Cloud

The EUCare Portal utilizes **Microsoft's secure offshore cloud infrastructure (e.g., Microsoft Azure)** to support high availability, scalability, and disaster recovery. As a result, **personal data may be processed or stored outside Brunei Darussalam.**

In accordance with **PDPO Section 24**, we ensure:

- The data recipient (Microsoft) implements protection equivalent to Brunei's data protection requirements;
- Data is encrypted, access is strictly controlled, and subject to international certifications (ISO/IEC 27001, ISO/IEC 27018, SOC 2);
- Cross-border transfers are governed by binding corporate agreements and data processing addendums (DPAs) ensuring compliance and accountability.

EUCare remains fully responsible for your data's integrity and protection regardless of location.

## 10. Your Rights

Under PDPO Sections 18–20, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Withdraw previously given consent
- Lodge complaints related to data use

Requests can be made via the EUCare support portal or to the Data Protection Officer.

## 11. Contact Us

If you have questions or wish to exercise your data rights, please contact:

**EUCare Data Protection Officer**

Email: [eucare\\_dpo@bsp-shell.bn](mailto:eucare_dpo@bsp-shell.bn)

Phone: +673 7453000