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**ANONIMIZATION AND PSEUDONYMIZATION POLICY**

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# Scope, Purpose and Users

The purpose of this document is to provide guidance to [Company Name] (“The Company”) for establishing and maintaining pseudonymization and encryption of personal data.

The users of this document are the Data Protection Officer, IT/IT Security Officer, and the representatives of the business units responsible for processing personal data.

# Reference Documents

* Article 32 of the EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC);
* “Opinion 05/2014 on Anonymisation Techniques” of Article 29 Data Protection Working Party;
* [relevant national law or regulation for GDPR implementation]
* [other local laws and regulations]

# Definitions

**“Pseudonymization”** means the processing of personal data in such a way that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**“Anonymization”** means processing personal data with the aim of irreversibly preventing the identification of the individual to whom it relates. Data can be considered anonymized when it does not allow identification of the individuals to whom it relates …

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