AZULPARTNERS

# Data Retention Policy

*Effective May 25, 2018*
Last Revised: May 25, 2018

## Introduction

This data retention policy sets out the obligations of Azul Partners ("us/we/our") and the basis upon which we shall retain, review and destroy data held by us, or within our custody or control.

This policy applies to our entire organization including our officers, employees, agents and sub-contractors.

## Objectives

It is necessary to retain and process certain information to enable our business to operate. We may store data in the following places:

- any third party servers;
- potential email accounts;
- desktops / laptops;
- employee-owned devices;
- potential backup storage; and/or
- our paper files.

This policy applies equally to paper, electronic media and any other method used to store personal data. The period of retention only commences when the record is closed.

We are bound by various obligations under the law in relation to this and therefore, to comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully in respect of their personal data.

This Policy sets out the procedures that are to be followed when dealing with personal data and how we aim to comply with the Regulation in so far as it is possible. This policy should be read in conjunction with our other policies that are relevant such as privacy policy.

## Security and Storage

All data and records are stored securely to avoid misuse or loss. We will take appropriate security measures against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to, personal data.

We have procedures and technologies in place to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if there is agreement by them to comply with those procedures and policies, or if there are adequate measures in place.

**Retention Policy**

Data retention is defined as the retention of data for a specific period of time and for backup purposes.

We shall not keep any personal data longer than necessary, but acknowledge that this will be dependent on the different types of documents and data for which we have responsibility.

From time to time, it may be necessary to retain or access historic personal data under certain circumstances such as if we have contractually agreed to do so or if we have become involved in unforeseen events like litigation or business disaster recoveries.

**Destruction and Disposal**

Upon expiry of our retention periods, we shall delete confidential or sensitive records categorized as requiring high protection and very high protection, and we shall either delete or anonymize less important documents. We shall also delete personal data upon a user's request (the "right to be forgotten"), in accordance with the user's rights and our obligations under the law.

We have a continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records shall be securely destroyed electronically or by shredding if possible. Non-confidential records may be destroyed by recycling.