Data Deletion Policy

1. Introduction

This Data Deletion Policy outlines the procedures and guidelines for the secure and timely deletion of customer data in compliance with the General Data Protection Regulation (GDPR). The policy ensures that data is retained only for the necessary period and is deleted promptly when it is no longer required for the purposes for which it was collected.

2. Scope

This policy applies to all employees, contractors, and third-party vendors who have access to customer data within MyOnlineStore B.V..

3. Definitions

Personal Data: Any information related to an identified or identifiable natural person. Data Subject: An identifiable individual to whom the personal data relates.

4. Data Classification

Customer data shall be classified based on its sensitivity, with specific attention to personal data under the GDPR.

5. Data Retention Periods

Customer data will be retained for a period of three months after the formal end of the contract between the customer and MyOnlineStore B.V..

See Attachement A for a detailed list of retention periods per data category.

6. Data Deletion Procedures

Customer data will be securely and permanently deleted from all systems and databases within three months of the formal termination of the contract.

Data deletion will be carried out using industry-standard methods to ensure irreversibility.

7. Data Subject Rights

Data subjects have the right to request the deletion of their personal data. Additionally:

Upon request, MyOnlineStore B.V. is obligated to provide data subjects with an export of their data in a commonly used and machine-readable format, facilitating compliance with other legislation.

If providing a data export is not feasible, MyOnlineStore B.V. may offer a look-up license for a defined time to allow the data subject to access their data. In such cases, a customer contract and a data processing agreement must be signed to formalize the continued processing of the data during the specified period.

8. Review and Audit

Regular reviews and audits will be conducted to ensure compliance with this data deletion policy. The data protection officer is responsible for overseeing these activities.

9. Employee Training

Employees will receive training on data deletion procedures and the importance of compliance with the GDPR.

10. Legal and Regulatory Compliance

This policy is designed to comply with the GDPR and other relevant data protection laws.

11. Communication

This policy will be communicated to all relevant stakeholders, and any updates will be promptly shared.

12. Updates and Revisions

This policy will be reviewed periodically and updated as necessary to ensure ongoing compliance with applicable laws and regulations.

13. External Resources

For additional insights into our data protection program, you may refer to <u>Visma's Trust</u> <u>Centre</u>.

Attachement A

Category	Data Type	Purpose for Processing Data	Legal Basis	Role	Confidentiality	Deletion Period
Financial Services Data	Basic Personal Data (user names, emails, IP's,)	Only as necessary to provide the service to the customer	Contract with Customer	Data Processor	Restricted	3 months
Marketing Data	Basic Personal Data (user names, emails, IP's,)	Only as necessary to provide the service to the customer	Contract with Customer	Data Processor	Restricted	3 months
Statistical or Technical Data	Basic Personal Data (user names, emails, IP's,)	Other purpose for processing	Legitimate Interest	Data Controller	Restricted	3 months