

ASPIRANT'S Data Retention and Disposal Policy

1 Scope

- 1.1. This policy is to be consulted when data retention or disposal of personal information is being considered or conducted. All Aspirant's records as they relate to the Bright Sky application and website, whether paper or digital are subject to the retention and disposal requirements of this policy.
- 1.2. Data Privacy Laws provide that personal data cannot be retained longer than is reasonably necessary to fulfil the purpose that such data was originally collected. It is Aspirant's intention to retain little to no personal data about the users of the Bright Sky application.
- 1.3. There are also circumstances in which personal data must be destroyed at the request of the persons to whom such personal data relates.
- 1.4. This policy may be updated from time-to-time at Aspirant's discretion.

2 Responsibilities

- 2.1. The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2. Asset owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the Data Privacy Laws.
- 2.3. The IT Manager is responsible for managing the secure disposal of all storage media.
- 2.4. The Privacy Officer is responsible for oversight of storage of data in line with this procedure.
- 2.5. The Privacy Officer is responsible for oversight of disposal of data.

3 Retention of Data

- 3.1. Records includes both operational data or historical data which are in electronic or non-electronic formats, for example emails, hard copy documents, soft copy documents, video and audio and data generated by physical access control systems
- 3.2. The required record type, retention periods and responsibility of all personal data is recorded in the Retention and Disposal Schedule under the following categories:
 - (a) Personal Data Record Category
 - (b) Retention period required by law
 - (c) Aspirant's retention period
 - (d) Retention period to start from (at creation, submission, payment, etc.)
 - (e) Retention period justification
 - (f) Format of Retention
 - (g) Record Owner
 - (h) Disposal method
 - (i) Comments
- 3.3. Any personal data that Aspirant gathers will be retained only for as long as is necessary for us to carry out the particular purpose of the processing set out in the privacy notice or privacy policy associated with the particular personal data being gathered.
- 3.4. Each data asset that is stored is marked programmatically with the name of the record, the record type, the date of storage, the required retention period, the planned date of destruction, and any special information unique to that data asset.

4 Disposal of Data

- 4.1. Data cannot be kept in a form which permits the identification of any person for longer than needed for the legitimate business purpose or purposes for which Aspirant originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements.
- 4.2. On at least an annual basis, the Privacy Officer and the IT Manager will review the retention periods of all personal data, and will identify any data that is no longer required in the context of the registered purpose.
- 4.3. The Privacy Officer is responsible for oversight of the disposal of data once it has reached the end of the retention period.
- 4.4. Destruction must be completed within 30 days of the planned retention period. Destruction is handled as follows:
 - (a) Disposal of personal information must be by a method that ensures no possibility of reconstructing the contents.
 - (b) Documents containing confidential and restricted information that are to be destroyed are shredded, using a shredder with an appropriate security classification. The waste is removed by the approved contractor.
 - (c) Physical records should be disposed of in-house by cross-cut shredding with an appropriate security classification and placed into locked rubbish bins for collection by an approved disposal firm. In some instances, a professional shredding service may need to be employed to ensure the security of personal information.
 - (d) Simply deleting electronic records does not satisfy destruction.
 - (e) Emails are deleted within 24 hours of being sent from the mailbox, according to system retention settings. These emails are permanently deleted at that time. The system will be reviewed manually by Bright Sky support on a monthly basis to ensure the deletion schedule is being followed.
 - (f) All virtual machine and database backups will be reviewed quarterly to ensure that the deletion schedule is being followed.
- 4.5. The retention period may be prolonged where:
 - (a) Aspirant must retain the record under applicable law;
 - (b) Aspirant is being investigated on an ongoing basis by authorities to prove compliance with any legal requirements;
 - (c) Aspirant is exercising legal rights in cases of law suits or similar court proceedings; or
 - (d) The data is required for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Where personal data is retained beyond the intended processing period, such processing must be justified, minimised, encrypted and/or pseudonymised in order to protect the identity of the individuals in the event of a personal data breach.

- 4.6. If a valid subject erasure request is received by Aspirant and no exemption applies then Aspirant will have to take steps to ensure erasure from back-up systems as well as live systems is conducted.

5 Record

A Retention and Disposal Schedule is retained showing what records or media were destroyed and/or disposed of, and when. The Retention and Disposal Schedule is adjusted once the records or storage media have been disposed of.

Last Updated June 2020

Retention and Disposal Schedule

Personal Data Record Category	Retention period required by law	Aspirant's Retention period	Retention period to start from (at creation, submission, payment, etc.)	Retention justification	Format of Retention and Location	Record Owner	Disposal method	comments
Anonymized Customer ID Setting	n/a	Perm	n/a	Required to facilitate certain settings being retained between uses of the app	Database	Bright Sky Support	n/a	
Customer Language Settings	n/a	Perm	n/a	Required to facilitate certain settings being retained between uses of the app	Database	Bright Sky Support	n/a	
Covert Setting	n/a	Perm	n/a	Required to facilitate certain settings being retained between uses of the app	Database	Bright Sky Support	n/a	

BRIGHT SKY DATA RETENTION AND DISPOSAL POLICY

Bright Sky Mailbox Contents	n/a	1 hour	Submission	Reasonable length of time to ensure proper deletion of private emails	Email	Bright Sky support	Permanently deleted email	
Media taken through the app and email sent through the app	n/a	5 minutes	submission	Reasonable length of time to ensure proper deletion of media taken through the app and emails sent through the app	email	Bright Sky Support	Permanently deleted	The type of phone and user settings may make programmatic deletion of media impossible through the Bright Sky. Further, Media taken outside of the app are not able to be programmatically deleted from the app. For this reason, Users are strongly encouraged to ensure that the media hasn't been added to the camera roll through user actions.
Customer Actions	n/a	1 year	When action taken	For analytics	Database	Bright Sky Support	Programmatically deleted	
Backup of Databases	n/a	1 year	At creation of the backup	Business Continuity	Azure cloud, in West Europe	IT Manager	Programmatically deleted	
Backup of Virtual machine	n/a	1 year	At creation of the backup	Business Continuity	Azure cloud, in West Europe	IT Manager	Programmatically deleted	