



# Retention Policy

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Version:	1

## Purpose

The purpose of this policy is to create a framework so that certain sensitive information data are regularly reviewed and disposed of when they are no longer needed.

## Introduction

The scope of this policy covers the retention of all data held by Medical Tracker. Moreover, this also applies to any third-party contractors or vendors that may hold information on Medical Tracker in order to conduct business with and for the company. This includes payment information, customers' data and employees' data.

The information contained in this policy represents the actions taken by Medical Tracker concerning all data, and its storage or deletion.

## Policy

Medical Tracker has implemented an information retention policy to ensure that all information kept for legal, regulatory and business requirements is limited. Medical Tracker ensures that data will be:

- Processed fairly and lawfully.
- Adequate, relevant and not excessive.
- Kept secure and be accurate.
- Kept no longer than is necessary and in compliance with the Data Retention Schedule.
- Processed in-line with the client's or employee's rights.
- Not transferred to other countries that do not comply with the Data Protection Act 2018 and General Data Protection Regulation (GDPR).

Furthermore, processes are in place for secure disposal when data no longer needs to be retained for legal, regulatory and business requirements. An automatic or manual executed process is in place for identifying and ensuring secure removal of data. Please also refer to the ISMS Aspects Directives and the ISMS Aspects Policies in relation to the secure destruction of data including data held on removable media or in paper format.

The separate Data Retention Schedule contains a comprehensive list of information items held by Medical Tracker and the specified periods of time such information must be retained for, for reasons of compliance with legal or operational needs.