

Personal Data Retention & Erasure Policy

Base2 Solutions (JBR Technologies)

Last Update: 6/12/2018

1. Policy Statement

This data retention & erasure policy will define how Base2 Solutions stores, retains, archives, retrieves, and disposes of personal data (as defined in the GDPR Laws) that it receives, holds, uses, and processes as it performs its business practices. Inappropriate retention of such personal data may lead to a breach of contract.

2. Responsibilities

The data protection laws aim to reduce the time that personal data is held by entities after the original consented purpose of it being held or processed has finished. Base2 Solutions has considered the nature of the data it holds, the methods and reasons for clients and other individuals for giving their consent, and how such consented purposes ceases alongside the justified general legal and practical need to retain it.

Base2 Solutions will ensure all employees in contact with personal data are aware of this Data Retention Policy, and of the personal data retention periods as stated in this policy.

3. Data Acquisition & Control

Personal Data is acquired by Base2 Solutions through expressed consent on it's website, consented list purchases, business development pursuits, and employment.

No personal data acquired by Base2 Solutions will be shared with another entity, nor will any personal data ever be sold to another entity.

4. Retention Periods

| Personal Data Type | Retention Period | Reason | Lawful Basis |
|---------------------------|--|--|----------------------------------|
| Personnel Files | 7 years from date of employee leaving | Employment data for Taxation investigation time limits for assisting both the Company and the employees | Contract |
| Candidate Data | 3 years | Time in which candidates will be considered for new position openings | Consent |
| Existing Customer Data | Until the end of the customer relationship | Need data to maintain strong customer communication & relationships | Contract, Legitimate Interest |
| Potential Customer Data | After 3 years of inactivity | If the contact has showed no interest for 3 years, there is no need to hold personal data | Consent, Legitimate Interest |

Personal data will, so far as technologically possible at the time, be deleted/redacted or otherwise destroyed as soon as reasonably practicable after the said retention period.

END OF POLICY