

Windowmaker Software Ltd – Data Retention and Deletion Policy

1. Purpose

This Data Retention and Deletion Policy outlines the procedures implemented by Windowmaker Software Ltd ("the Company") to manage the retention and secure disposal of data in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other relevant legislation.

2. Scope

This policy applies to all personal data and company data held by Windowmaker Software Ltd, regardless of the format in which it is stored (e.g., electronic, paper, audio), and to all employees, contractors, and third-party service providers who process data on behalf of the Company.

3. Retention Periods

The Company retains data only for as long as necessary to fulfill the purposes for which it was collected, including satisfying legal, regulatory, contractual, operational, or reporting requirements.

Data Category	Retention Period	Notes
Customer and Prospect Contact Information	Retained for the duration of the commercial relationship and up to 2 years after the last meaningful interaction	Necessary for sales and support purposes.
Financial and Transactional Data	7 years from the date of transaction	In accordance with accounting and tax obligations.
Support Tickets and Related Communications	5 years from resolution of the ticket	Allows for continuity and future reference for recurring issues.
HR and Employment Records	Up to 7 years after end of employment	As required by employment legislation.
Email Communications	Up to 2 years after communication is closed	Subject to regular review and deletion procedures.

Website Analytics	26 months	Automatically deleted by Google Analytics.
Software Usage Logs	Up to 3 years	Used for internal analytics and troubleshooting.

4. Data Deletion Procedures

All data identified as no longer necessary is securely deleted in a timely and efficient manner. The method of deletion is determined by the type and sensitivity of the data:

- **Electronic Data:** Securely deleted using software that permanently removes data from storage devices.
- **Physical Data:** Shredded or otherwise destroyed beyond reconstruction.
- **Third-Party Processors:** Required to comply with data deletion instructions and provide confirmation of deletion upon request.

5. Data Subject Rights

In accordance with the UK GDPR, data subjects have the right to request:

- Access to their personal data;
- Rectification of inaccurate or incomplete data;
- Restriction of processing;
- Objection to processing; and
- Deletion of their personal data (right to erasure).

6. Exceptions to Deletion

There are specific circumstances under which the Company may retain data beyond its normal retention period, including:

- Compliance with legal or regulatory obligations.
- Ongoing contractual obligations or dispute resolution.
- Archival, research, or statistical purposes (where permitted by law and with appropriate safeguards).

7. Data Storage and Security

The Company implements appropriate technical and organisational measures to ensure data is securely stored, including:

- Role-based access control;
- Regular audits and monitoring;
- Encryption of sensitive data;
- Use of reputable, compliant cloud service providers.

8. Requesting Deletion of Data

Data subjects may request the deletion of their personal data under the “right to erasure.”

How to Submit a Deletion Request:

Requests must be submitted in writing via one of the following methods:

Email: privacy@windowmaker.com

Postal Mail:

Data Protection Officer

Windowmaker Software Ltd

[Insert full company address here]

Required Information:

- Full name or company name;
- Contact details;
- Description of the data to be deleted (e.g., email address, account ID);
- Relevant reference numbers (e.g., customer ID, ticket number).

Verification Process:

To ensure data security, the Company may request verification of identity or authority prior to processing any deletion request. Authorised representatives must provide evidence of their authority.

Timeline and Response:

- Acknowledgement of the request will be sent within five (5) business days.
- Deletion will be completed within thirty (30) calendar days unless legally or operationally restricted.
- If certain data must be retained, the Company will provide a clear explanation and expected timeline for deletion.

9. Roles and Responsibilities

- The **Data Protection Officer (DPO)** is responsible for overseeing compliance with this policy and responding to data deletion requests.
- All **employees and contractors** must adhere to this policy and follow procedures for data handling, retention, and disposal.

10. Policy Review

This policy shall be reviewed annually or in response to significant legal, operational, or technological changes. Revisions will be approved by senior management.

11. Contact Information

For questions about this policy or to exercise your data rights, please contact:

Data Protection Officer

Windowmaker Software Ltd

Email: privacy@windowmaker.com

Approved by: Senior Management, Windowmaker Software Ltd

Effective Date: [Insert Date]

Last Reviewed: [Insert Date]