



Address: 3 Tottum Ave, Durbanville, Cape Town, 7550

Postal Address: PO Box 1420, Durbanville, 7551

DATA RETENTION POLICY



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1 INTRODUCTION

- 1.1 This is the Data retention policy for Gwirio (Pty) Ltd and is subject to POPIA 4, 2013 and PAIA, 2000
- 1.2 Gwirio provides two levels of service to the market:
 - 1.2.1 Gwirio functions as a Data Operator as defined in the Protection of Personal Information Act 4 of 2013(POPIA) on process information on behalf of Responsible Parties / Data Owners.
 - 1.2.2 Gwirio functions as a Responsible Party on behalf of Data Subjects that register on our application and provide Gwirio with personal information for the purposes of privacy services.

2 Data retention as a Data Operator

- 2.1 Gwirio, when providing services as a Data Operator on behalf of a Responsible Party / Data Subject :
 - 2.1.1 Will not retain, store or process any personal information on our systems for longer than 3 days.
 - 2.1.2 The information is processed according to the agreed services only.
 - 2.1.3 All information is removed after processing
 - 2.1.4 All certificates are anonymised and encrypted
- 2.2 Gwirio retains the following information
- 2.3 Anonymised certificates with private and public keys for verification purposes.

3 Data retention as a Responsible party

- 3.1 Gwirio stores and process a limited set of personal information for each Data Subject and this includes:
 - 3.1.1 Name and Surname
 - 3.1.2 Contact details that include email and contact numbers
 - 3.1.3 Residential address
 - 3.1.4 Dependents registered against this Data Subject



- 3.2 Gwirio stores and process the personal information for as long as the Data Subject allows for such processing and as outlined under section 5 of this document.

4 Email retention policy

- 4.1 Although not all emails contain personal data, Gwirio treats all email in the same manner to ensure that all information remains private.
- 4.2 Some users who contact us may want to include other recipients as well, depending on the nature of the email. Any users who includes other recipients when sending us an email, do so at their own risk as Gwirio cannot be held liable for how those other recipients treat your emails.
- 4.3 All emails in active inboxes will be limited to a time frame of 6 months. Thereafter it will be moved to a searchable archive on our local devices and on a server off -site. Emails will be archived for as long as legally required for audit and record purposes. Generally, this will be for 5 years. Archived emails older than this will be permanently deleted. Please see section 5 for more information.
- 4.4 All emails in active sent folders will be moved to archive on our local devices and on a server off site after 6 months. Sent emails will be archived for as long as legally required for audit and record purposes. Generally, this will be for 5 years. Archived sent emails older than this will be permanently deleted.
- 4.5 In rare cases non-compliance with this policy may be authorised by means of a risk acceptance process, which requires a risk acceptance memo to be signed by a manager and approved by the Information Office prior to such non-compliance taking place.



5 Retention table

	Retention document categories			
	Business information	Administrative information	Fiscal information	Other information
Physical documents	As long as is required	As long as is required	At least 5 years	According to need
Electronic files stored on network drives	As long as is required	As long as is required	At least 5 years	According to need
Electronic files stored on local disk	As long as is required	As long as is required	At least 5 years	According to need
Electronic mail messages	As long as is required	As long as is required	At least 5 years	According to need
Retention period	As long as is required	As long as is required	At least 5 years	According to need

6 REVISION OF POLICIES

- 6.1 Gwirio reserve the right to and may from time to time update this notice. Any such revision will be published as an amended version on the Gwirio website.
- 6.2 Following this, any change to this Policy will be posted as an updated version and readers are advised to visit and re-read this policy on a regular basis.