

Quality Control & Compliance Initiative

DATA RETENTION & DISPOSAL POLICY

Author:	Phonovation Quality Control Group Gavin Carpenter
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Revised by:	Pedro Quintas
To:	All Phonovation Staff

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Data Retention & Disposal Policy

Retention

1. Data will be kept for no longer than is necessary for the primary purpose for which it was obtained.
2. Data will be retained for any period required by law.
3. Some Data that is not otherwise subject to retention for normal reasons may need to be retained because of circumstances such as litigation or government investigation.
4. Subject to paragraphs 2 and 3 the following specific retention periods will be followed:

Type of Record or Information ¹	Retention Period
Personal Call Traffic Details (actual record of call, i.e. time of call, caller, number called, duration of call, etc)	<p>6 months plus current month (max.) for our purposes (as described above and in our general terms and conditions e.g. market research, product development).</p> <p>Interconnect call records (i.e. the records of calls made to or received from other networks) are retained for 12 months for inter-operator billing purposes.</p> <p>For legal purposes call traffic records will be retained for a period of 2 years to comply with State requirements. This retention will take place in a restricted access secure system and will not be used for Phonovation's commercial purposes.</p>
Business Call Traffic Details (actual record of call, i.e. time of call, caller, number called, duration of call, etc)	<p>6 months plus current month (max.) for our purposes (as described above and in our general terms and conditions e.g. market research, product development).</p> <p>Interconnect call records (i.e. the records of calls made to or received from other networks) are retained for 12 months for inter-operator billing purposes.</p> <p>For legal purposes call records will be retained for a period of 2 years to comply with State requirements. This retention will take place in a restricted access secure system and will not be used for Phonovation's commercial purposes. Business customers may elect to avail of ancillary services that may retain their call details for longer periods. This retention will only take place where the customer has agreed to the additional service.</p>
Data Service Usage Details (WAP site visits, web site visits, live! Use, text alert subscriptions)	<p>6 months plus current month (max.) for our purposes (as described above and in our general terms and conditions). This data does not include content.</p> <p>For legal purposes usage records will be retained for a period of 12 months to comply with State requirements. This retention will take place in a restricted access secure system and will not be used for Phonovation's commercial purposes.</p>
Cookies are stored on a per session basis only to aid your navigation of our web-sites. Persistent cookies may be set to store display related preferences. Depending on your browser you may also be able to control cookie use by altering your browser settings.	
Invoices & Statements	<p>6 years plus current year for invoices and statements.</p> <p>The call detail element of your standard bill will be severed and deleted after 6 months, as described above.</p>
Location Based Information for value added services (excluding network traffic data)	Deleted immediately on completion/ termination of the value added service.

¹ Texts (SMS) should also be considered together with all Call Traffic details mentioned

Disposal

Data Destruction

Security of Information is taken very seriously by Phonovation and our employees.

Phonovation understands and values clients' confidentiality and legal requirements when it comes to entrusting us to destroy their private data after the data retention period.

Phonovation will work with clients' requirements to provide secure destruction of sensitive information.

Electronic Data Destruction for outdated records is followed by a secure and thorough shredding process regarding any physical documents that aren't legally necessary anymore according to the Data Retention Policy.

Certification declaring complete destruction is provided at request.