



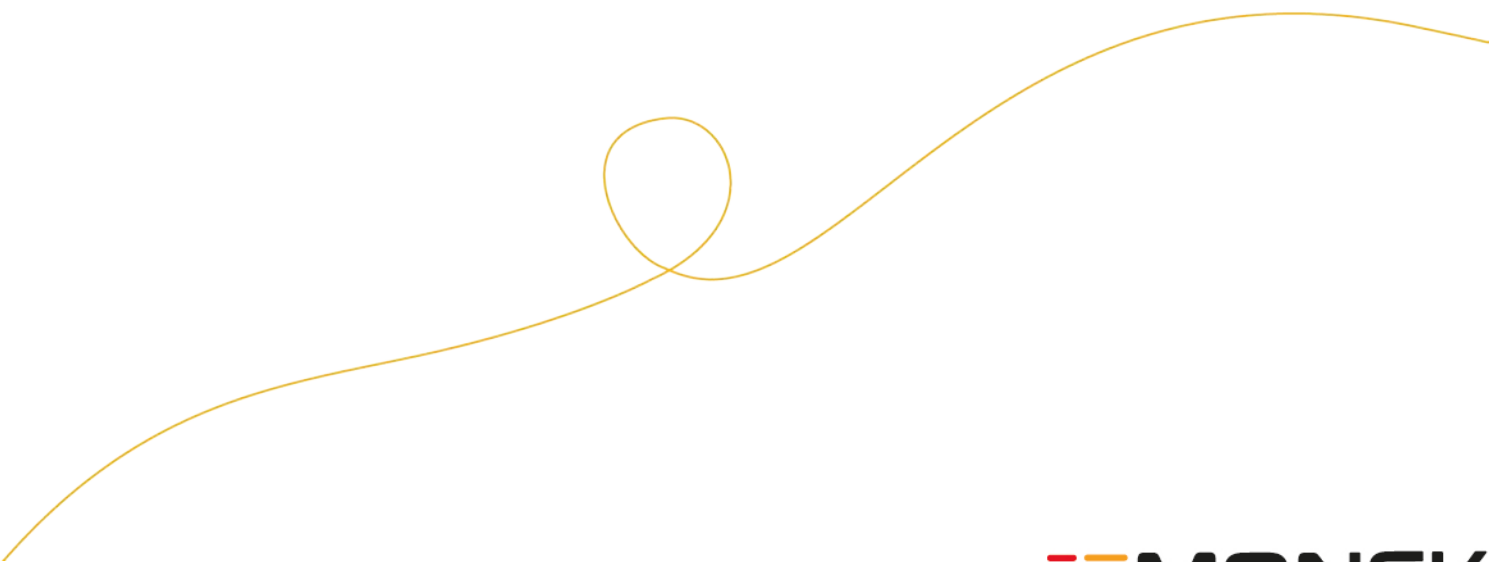
# Personal Data Retention Policy for MONEK LIMITED

ID: PRO-59

Version 1804

Effective from: 10<sup>th</sup> May 2018

Audience: ALL



## Table of Contents

1. Purpose.....	3
2. Scope .....	3
3. Policy .....	3
4. As a Processor .....	3
5. As a Controller.....	4

## 1. Purpose

This document describes MONEK LIMITEDs policy regarding how long personal data is held to ensure compliance with our Policies and Standards regarding IT security, financial regulation and GDPR.

## 2. Scope

This applies to any personal data held by MONEK LIMITED and their sub-processors.

Monek are classed as the Data Processor for all personal data processed on behalf of our merchants and partners as their Payment Service Provider.

Monek are classed as the Data Controller for all personal data relating to its employees.

## 3. Policy

Data will be sanitised and archived either based on an elapsed period of time as per our standard Data Retention Policy, upon receipt of a Data Subject Access Request or following termination of an employment or payment processing contract.

Any personal data that is retained will be protected, encrypted where necessary and stored securely in line with our standard Data Retention Policy.

## 4. As a Processor

1 – All data will be held for 13 months (excluding where specific contract terms take precedence) to enable us to fulfil our obligations to our merchants and partners regarding payment processing, defense against chargebacks, refunds, to assist in the prevention of nefarious activities such as fraud / money laundering and to provide further details where required by Law.

2 – All Personal Data older than 13 months will be sanitised – this will be done by replacing ALL fields with an “x” except those fields that we wish to retain such as date, amount and postcode to allow merchant reporting without holding any data that could be used to identify a specific person.

3 – All information held within our back office financial system will be retained for 7 years in line with financial regulations, no personal data exists within our billing system.

## 5. As a Controller

1 – We have obtained written confirmation from our third party service providers (TPSP's) who act as our sub-processors and who process the personal information we hold on Monek employees that they do so in a GDPR compliant manner.

2 – All HR paperwork will be shredded 13 months after any employee leaves with the exception of any payroll info which must be retained for financial auditing purposes.