

# PulseoXcore

## 1. PURPOSE AND SCOPE

This Data Retention Policy establishes guidelines for the retention and disposal of data collected and processed by PulseoXcore. This policy applies to all digital services and platforms provided by our organization.

## 2. REGULATORY COMPLIANCE

This policy is designed to comply with applicable data protection regulations including:

- General Data Protection Regulation (GDPR)
- ePrivacy Directive

## 3. DATA CATEGORIES AND RETENTION PERIODS

### 3.1 Personal Data

- Customer names, contact information, identification data
- Retention Period: 1 year
- Legal Basis: Contract performance, legitimate interests

### 3.2 Financial Data

- Payment information, billing records, transaction history
- Retention Period: 7 years (or as required by financial regulations)
- Legal Basis: Legal obligation, contract performance

### 3.3 Health Data (Special Category)

- Medical records, health insurance information, treatment data
- Retention Period: As required by healthcare regulations (typically 7-10 years)
- Legal Basis: Explicit consent, vital interests, medical diagnosis

### 3.5 Employee Data

- HR records, payroll information, performance evaluations
- Retention Period: 7 years after employment termination
- Legal Basis: Legal obligation, legitimate interests

## 4. RETENTION PRINCIPLES

### 4.1 Data Minimization

We retain only the minimum amount of data necessary for the specified purpose.

### 4.2 Purpose Limitation

Data is retained only for the original purpose of collection or compatible purposes.

### 4.3 Storage Limitation

Data is kept in a form that permits identification for no longer than necessary.

### 4.4 Regular Review

Retention periods are reviewed annually and updated as needed.

## 5. DATA DISPOSAL PROCEDURES

### 5.1 Secure Deletion

When retention periods expire, data is securely deleted using industry-standard methods.

### 5.2 Physical Media

Physical storage media containing personal data is destroyed or sanitized beyond recovery.

### 5.3 Documentation

All data disposal activities are logged and documented for audit purposes.

## 6. EXCEPTIONS TO RETENTION PERIODS

Data may be retained beyond standard periods when:

- Legal proceedings are pending or reasonably anticipated
- Regulatory investigations are ongoing
- Specific legal obligations require longer retention
- Data subjects have explicitly consented to longer retention

## 7. DATA SUBJECT RIGHTS

Under GDPR, data subjects have the right to:

- Request access to their personal data
- Request rectification of inaccurate data
- Request erasure of data (right to be forgotten)
- Request restriction of processing
- Object to processing
- Data portability

Requests should be submitted to: [hello@pulsoxcore.com](mailto:hello@pulsoxcore.com)

## 8. IMPLEMENTATION AND MONITORING

### 8.1 Responsibility

The Data Protection Officer (DPO) or designated privacy officer is responsible for implementing this policy.

### 8.2 Training

All employees handling personal data receive training on retention requirements.

### 8.3 Monitoring

Compliance with this policy is monitored through regular audits and reviews.

## 9. POLICY UPDATES

This policy is reviewed annually and updated as necessary to reflect:

- Changes in applicable laws and regulations
- Changes in business operations
- Technology updates
- Best practice developments

## 10. CONTACT INFORMATION

For questions about this Data Retention Policy, contact:

Data Protection Officer

PulseoXcore

Email: [hello@pulsoxcore.com](mailto:hello@pulsoxcore.com)

Last Updated: 05/12/2025

Next Review Date: 05/12/2026

This policy has been approved by the management of PulseoXcore and is effective immediately.