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	Document Classification:	Internal
	Effective Date	10 June 2024
<b>DATA RETENTION &amp; DESTRUCTION PROCESS</b>	Doc No	DPMP-PRO-08
	Revision	1.0

## AMENDMENTS LOG

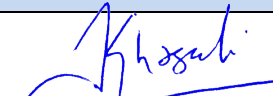
### Revision History

Version	Date	Revision Author	Summary of Changes
1.0	10 June 2024	Edwin Soedarta DPO	First Release

### Distribution

Name	Location
<i>All employees</i>	<i>Shared Folder</i>

### Review & Approval

Name	Position	Signature	Date
Khasali M	Director		10 June 2024

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**RECORDS FOR DOCUMENT REVIEW**

To ensure the continuing suitability, adequacy and effectiveness of the documented information and its relevancy, a review of its contents should be conducted at a planned interval or when significant changes occur. The review should include assessing opportunities for improvement of the documented information and the approach to managing data protection in response to changes to the organization environment, business circumstances, legal conditions as well as the technical environment.

**Instruction Guide:**

Version 1.0, 2.0, 3.0... Version changed with amendments

Version 1.0 Version remained unchanged but update the last and next date of review

VERSION	REVIEW BY	DATE OF REVIEW	NEXT REVIEW DATE
1.0	Edwin Soedarta (DPO) Khasali M (Director)	10 June 2024	9 June 2025

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## PURPOSE

This document describes the mechanisms and approaches for the retention and destruction of personal data in the organization’s possession or under its control, and where relevant to third parties that the personal data is disclosed to.

This procedure ensures that personal data is retained only for as long as necessary for the purpose for which it was collected, and there is legal or business purpose for its retention. Thereafter, the organization shall cease to retain the personal data through secure methods.

## SCOPE

This applies to personal data in the organization’s possession or under its control, and where relevant to third parties that the personal data is disclosed to.

## RESPONSIBILITIES AND AUTHORITIES

The Management has the prime responsibility and approval authority for this procedure.

The Data Protection Officer (“DPO”) shall ensure that data custodians follow this procedure.

## GUIDELINES

### 1. RETENTION GUIDELINES

- The organization shall document the retention period for the various types of personal data in the Data Inventory Map (DIM).
- A summary of the retention periods and purpose of retention shall be registered in the DPMP-PRO-08-F1 Personal Data Retention List for reference.
- The organization shall define and document via contractual agreement (where applies) the data retention periods, data disposal methods and mechanisms for various sets and types of personal data disclosed to third parties so that third parties can cease to retain personal data when the purpose of the data is no longer being served and retention is no longer necessary for legal or business purposes.
- The organization shall provide information in the applicable notices to individuals about the retention of their personal data or the DPO contact details to in case they have question about retention and disposal.
- The organization will not retain any unsolicited personal data.
- The organization shall review the retention periods during the yearly review of the DIM and as when significant changes occur that may affect the relevancy of the current retention periods (e.g., new systems or processes, feedback from stakeholders, emerging new technologies, revisions to relevant laws and regulations, international or industry guidelines, etc).

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## 2. DESTRUCTION GUIDELINES

The organization shall dispose of, destroy, or anonymize personal data when it is no longer necessary to retain it for any business or legal purpose in a manner that cannot be recovered or re-identified. This shall be through the following:

- Hard-copy documentation: Destroy the document by shredding using at least a P-3 security cross-cut shredder.
- Data in computer folders, e-mails, systems: Delete the file and empty the “trash bin”.
- Unsolicited personal data: If a document contains personal data that the organization does not need, the personal data shall be masked. If the organization does not need the whole document with personal data, the document shall be shredded using at least a P-3 security cross-cut shredder (if in physical copy), and shall be deleted and emptied in the “trash bin” (if in softcopies). If the unsolicited data is received through telephone, it will not be recorded.
- Removable storage media (e.g., USB, Hard Drives): Physically destruct (e.g., hammering) the storage media after reformatting. Disposal shall be recorded in the [DPMP-PRO-08-F2 Disposal Form](#) for an audit trail.

## 3. THIRD PARTY DISPOSAL GUIDELINES

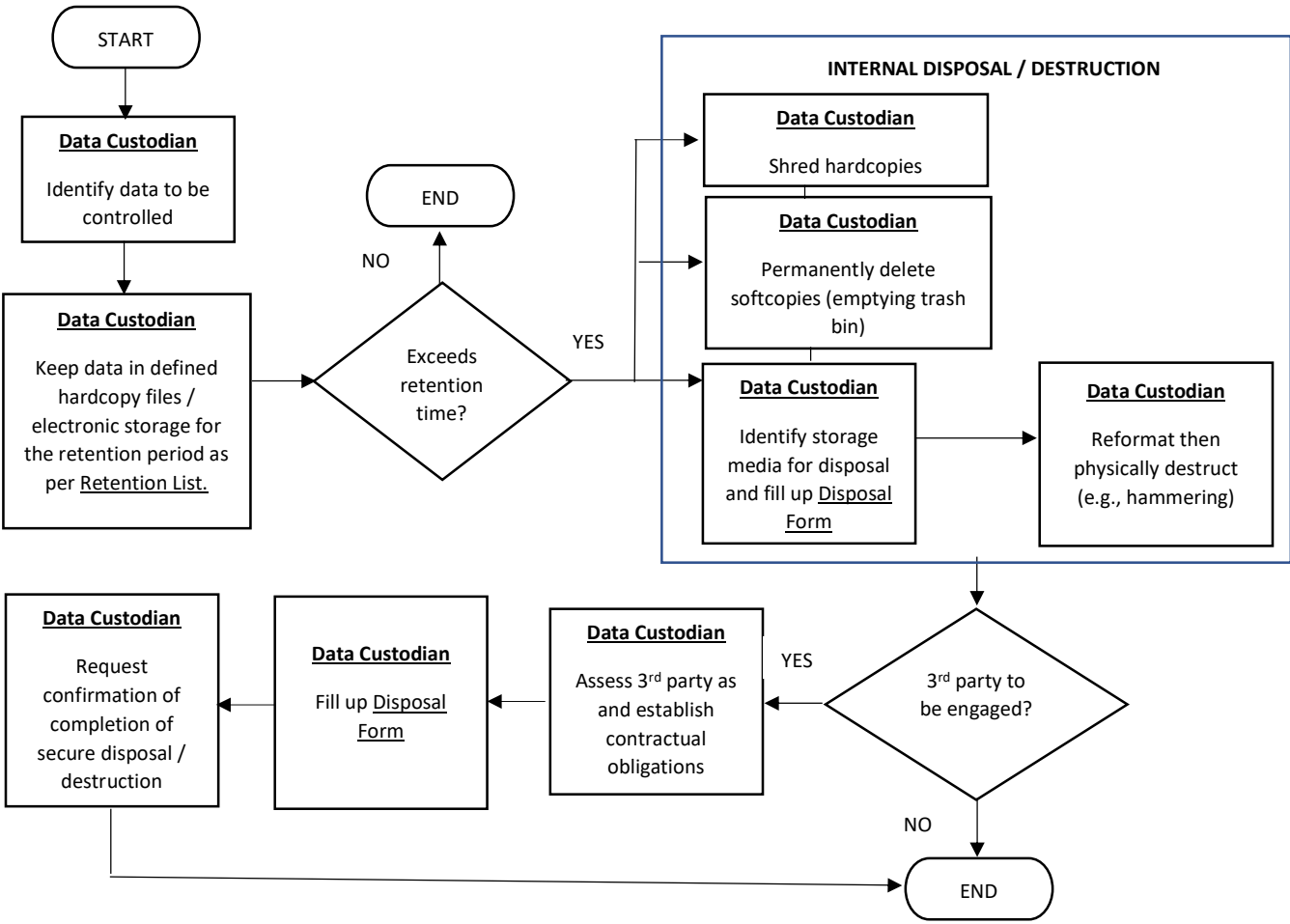
Where third party service providers are engaged to dispose, destroy, or anonymize personal data, the organization shall ensure that the following are followed to prevent any disclosure to unauthorized parties during the entire disposal, destruction or anonymization process.

- Assess the service provider, establish contractual agreement (NDA or confidentiality clause in contract, and Data Processing Agreement) and evaluate completion of service in line with [DPMP-PRO-06 External Provider Due Diligence Assessment & Evaluation](#).
- The appropriate security measures to be assessed when conducting the service provider due diligence assessment shall include, but not limited to:
  - Overall process and safeguards during transport, storage and actual destruction.
  - Physical security of containers for transporting and the destruction facility.
  - The organization may witness the actual destruction (if necessary).
  - Ensure that anonymization techniques (where applies) are robust and legal safeguards are in place to prevent re-attempts and further disclosure of the anonymized data.
- Monitor the activity of the service provider and ask for confirmation of disposal/destruction completion that states reasonable measures taken to protect the personal data during the entire disposal / destruction process.
- Engagement of a service provider for disposal or destruction and completion of the activity shall be recorded in [DPMP-PRO-08-F2 Disposal Form](#) for an audit trail.
- For anonymization service (where applies), an undertaking shall be required from the service provider not to attempt to re-identify the anonymized data and avoid further disclosure of the anonymized data to another party.

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- For cloud-based applications, the capability of the cloud to securely cease the retention of the personal data after the defined retention periods shall be assessed through the [DPMP-PRO-06-F2 CSP Questionnaire](#).

**PROCESS FLOW**



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**FORMS**

DPMP-PRO-08-F1      Personal Data Retention List

DPMP-PRO-08-F2      Disposal Form