

# Policy of retention and deletion rules for personal data

## PxP Shape sp. z o.o.

### 1. Purpose

The purpose of this policy is:

- a) Establish the rules under which PxP Shape Sp. z o.o. determines the periods of processing of personal data for which it is the Data Controller and the rules for deletion of such personal data,
- b) Establish a procedure for deletion of data processed by PxP Shape Sp. z o.o. as a processor or subprocessor on behalf of its contractors,
- c) Set procedures for securely deleting data and destroying physical storage media.

### 2. Definition

Terms used in this policy will have the following meanings:

- a) **Company** - PxP Shape Spółka z ograniczoną odpowiedzialnością with its registered office in Kraków (KRS: 0001011625),
- b) **GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation),
- c) **Policy** - this policy for retention and deletion of personal data,
- d) **Data security** policy - the general policy adopted in the Company for the processing and security of personal data
- e) **Personal Data (Data)** - has the meaning given in the Data Security Policy,
- f) **Retention period** - the period during which the Company processes Personal Data,
- g) **Data carrier** - a physical or virtual material or device that allows recording, storing and reading data,
- h) **Data erasure** - the process of permanently and effectively removing Personal Data from the Data Carriers,
- i) **Register of processing activities** - records maintained by the Company in accordance with Article 30(1) of the GDPR,
- j) **DPO** – data protection officer appointed by the Company,
- k) **Data Controller** - It is an entity that decides what Personal Data is processed, for what purpose, and in what manner.

### 3. Determining Data Retention Periods:

- a) The Company shall establish retention periods for Personal Data in the Registers of Processing Activities,
- b) Retention periods will be determined taking into account the necessity of the Company's processing of Personal Data for the time periods in question, in particular, taking into account the legal obligations imposed on the Company for the storage of Personal Data,

- c) Retention periods are determined by the Company taking into account the principle of retention limitation under Article 5(1)(e) of the GDPR and after consulting with DPO.

#### **4. Deletion**

- 1) General Rules for Deletion of Data:
  - a) After the expiration of the Retention Periods of the individual Personal Data, the Company shall delete the Data,
  - b) Deletion of the Data is carried out on an ongoing basis within 30 days of the expiration of the retention period,
  - c) DPO shall monitor in data processing systems to determine the expiration of the Retention Period.
- 2) Deletion of Data from data storage media and virtual space shall be carried out in a manner that ensures permanent deletion of Data or its anonymization.
- 3) Destruction of physical data carriers follows the following procedure:
  - Subject to liquidation of damaged or obsolete media and, in particular, hard drives with personal data from workstations and laptops / memory sticks / flash drives / SSD drives / DVDs / cell phones / smartphones are destroyed in a physical way. The method of destruction used, is the physical destruction (cutting, drilling, hammering) of the removed media / use of degausser / grinding in a specialized company confirmed by a destruction protocol or security certificate of the disposal company or a recording of the transport and disposal process,
  - Information media mounted in IT equipment and especially hard drives must be cleaned with specialized software before they are transferred outside the organization (e.g., sale or donation of desktops / laptops / smartphones),
  - Paper documentation is destroyed in strip shredders and, where required, in shredders of a higher standard,
  - Paper records containing Personal Data of special categories are destroyed through a document shredding company. The company is required to demonstrate a secure disposal procedure (e.g., have ISO27001 certification, records of the transportation and disposal process.).

#### **5. Deletion of Personal Data processed on behalf of other Data Controllers**

Personal data processed on behalf of other Data Controllers will be deleted at their request or dealt with according to provisions included in the processing entrustment agreements concluded.

#### **6. Protocol for destruction of physical data carriers**

The template for a protocol for the destruction of physical data carriers is an Appendix to this Policy.

#### **7. Document Control**

### Document Details

Document Type	Policy
Owner	Bruno Pimenta
Approvers	See below
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### Version History

Version	Date	Description of Change	Edited By	Reviewed and Approved? (Y/N) / Approver
1.0	24/06/2025	Document creation	Bruno Pimenta	Yes / Maria Pfister

**Appendix No. 1 to the Personal Data Retention and Deletion Policy**

**Minutes of  
destruction of physical data carriers in the company PxP Shape sp. z o.o.  
dated (...)**

Physical destruction of the data carriers in the presence was carried out:

1. (...),
2. (...),

The destruction involved the following data carriers:

L.p.	Name	no.	Method of destruction	Comments

**Signatures of those taking part:**

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