

**OnMobile Global Spain S. L. U.
Data Retention Policy**

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Approval and authorization:

Name	Designation & Department	Date
Rajinder Sharma	General Counsel	26.12.2024

Purpose:

The purpose of this Data Retention Policy is to establish guidelines for retaining and storing personal data in compliance with the General Data Protection Regulation (GDPR) and Spanish Data Protection Act (Ley Orgánica de Protección de Datos) (Organic Law 3/2018). This policy ensures that personal data is retained for the necessary periods as required by law and to fulfil the purposes for which it was collected.

Policy Statements:

1. **Data Minimization:** Only personal data necessary for specified, explicit, and legitimate purposes will be collected and processed.
2. **Data Retention Periods:** Personal data will be retained for no longer than is necessary for the purposes for which the data is processed.
3. **Legal Compliance:** Data retention will comply with applicable legal, regulatory, and contractual requirements.
4. **Data Disposal:** Personal data that is no longer required will be securely disposed of in a manner that ensures the data cannot be reconstructed or read.
5. **Review and Update:** Retention periods will be reviewed regularly, and this policy will be updated as necessary to reflect changes in legal, regulatory, or business requirements.

Retention Periods:

Personal data will be retained for the period necessary to fulfill the purposes for which it was collected, as outlined below:

Data Type	Retention Period	Justification
User Data		
-Account Information	Active account period + 3 years	To manage user accounts and comply with legal requirements
-Transaction Records	8 Years	For financial compliance and auditing purposes
-Usage Data (Tones, Videos, Gaming)	2 years from the date of collection	To enhance user experience and for analytics purposes
Employee & Contractor Data		
-Employment Records	8 years after employment ends	To comply with employment laws and regulations

- Payroll Information	8 Years	For tax and financial compliance purposes
- Employment Contracts	Duration of employment + 8 years	Compliance with employment laws and contractual obligations
- Training Records	Duration of employment + 5 years	Compliance with employment and safety regulations
- Leave Records	Duration of employment + 3 years	Compliance with employment laws
Third-Party Data		
-Vendor Contracts and Correspondence	8 years after contract termination	For contractual and compliance purposes
Other Data		
- Marketing Data (e.g., email lists)	Until consent is withdrawn or data is no longer relevant or 3 years from the date of collection	Based on consent provided by data subjects and marketing needs
- Website Usage Data	3 years	For analytical purposes and to improve user experience
- Support Ticket Data	Duration of the support relationship + 1 year	To ensure service quality and address any follow-up issues

Data Deletion, Disposal and Anonymization:

Personal data that is no longer required will be securely deleted or anonymized so that the data subject cannot be identified.

Yearly audits will be conducted to ensure that personal data is not retained longer than necessary. Personal data that has reached the end of its retention period will be securely disposed of to prevent unauthorized access or accidental disclosure. Disposal methods may include permanent deletion, shredding physical documents, or securely destroying electronic storage media.

Data Backup:

Before disposal, personal data will be removed from any backups or archives to ensure complete removal from our systems.

Review and Update:

- This Data Retention Policy will undergo periodic reviews to ensure its continued relevance and compliance with applicable laws and

regulations. Necessary updates or revisions will be made to reflect changes in data processing practices or legal requirements.

Employee Awareness and Training:

Employees and contractors who handle personal data will receive appropriate training and guidance on data retention practices to ensure compliance with this policy and applicable data protection laws.

Roles and Responsibilities

The respective departmental heads of the Company shall be responsible for the maintenance and preservation of documents in terms of this policy.

Document Management:

This Data Retention Policy will be maintained revisions or updates will be properly documented and communicated to relevant personnel.

Date of Last Update: December, 2024