

# MASTER WiZR

## Data Retention Policy

Last updated: April 7, 2023

### Introduction

This Data Retention Policy ("Policy") outlines the principles and practices followed by MASTER WiZR ("we," "us," or "our") regarding the retention, storage, and deletion of personal data collected and processed through MASTER WiZR platform ("Platform"). The purpose of this Policy is to ensure that personal data is managed in a manner that respects individual privacy rights, complies with applicable laws and regulations, and aligns with industry best practices.

As part of our commitment to privacy, we have implemented this Policy to govern the retention and disposal of personal data in a manner that is consistent with the principles of data minimization, purpose limitation, and legal compliance. By providing a clear and transparent framework for the handling of personal data, we aim to maintain the trust and confidence of our users and stakeholders, while also reducing the risk of unauthorized access, alteration, or destruction of personal data.

This Policy applies to all personal data collected and processed through the Platform, including account information, communication data, usage data, device and connection data, and location data. The Policy should be read in conjunction with our Privacy Policy, which provides more detailed information on the types of data we collect, how we use and share that data, and the rights and choices available to users.

### Data Retention Periods

MASTER WiZR has established specific retention periods for the various types of personal data collected and processed through our platform. These retention periods are designed to ensure that personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, in accordance with the principles of data minimization and purpose limitation. Below are the retention periods for each category of personal data:

**a. Account Information:** Account information, including email address, password, profile picture, username, and any additional personal information provided during registration or in the user profile, will be retained for the duration of the user's account. Upon account closure or deletion, account information will be deleted within 30 days, unless a longer retention period is required by law or necessary for legal or regulatory purposes.

**b. Communication Data:** Communication data, including messages, voice and video calls, file sharing, meeting notes, comments on Social Boards, News Hub, and Info Hub, and any other user-generated content, will be retained for a period of 12 months from the date of creation or receipt, unless a longer retention period is required by law or necessary for legal or regulatory purposes.

**c. Usage Data:** Usage data, including user interactions with the platform, access and usage of features, and preferences, will be retained for a period of 24 months from the date of collection, unless a longer retention period is required by law or necessary for legal or regulatory purposes.

**d. Device and Connection Data:** Device and connection data, such as IP address, browser type, operating system, device information, and other technical information, will be retained for a period of 12 months from the date of collection, unless a longer retention period is required by law or necessary for legal or regulatory purposes.

**e. Location Data:** Approximate location data based on the user's IP address will be retained for a period of 12 months from the date of collection, unless a longer retention period is required by law or necessary for legal or regulatory purposes.

It is important to note that these retention periods are subject to change based on legal, regulatory, or operational requirements. MASTER WiZR will review and update these retention periods as necessary and communicate any significant changes to our users through updates to this Policy or other appropriate means.

### **Data Retention Principles**

MASTER WiZR adheres to the following principles when retaining personal data collected and processed through our platform, in order to ensure that the data is handled responsibly and in compliance with applicable laws and regulations:

**a. Purpose Limitation:** Personal data is retained only for the specific purposes for which it was collected, as outlined in the "How We Use Your Information" section of our Privacy Policy. We do not retain personal data for purposes other than those for which it was originally collected, unless we have a legitimate reason to do so or have obtained the user's consent.

**b. Data Minimization:** We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, as defined in our data retention periods. We regularly review and update our retention practices to ensure that we are not retaining personal data longer than necessary.

**c. Accuracy:** We take reasonable steps to ensure that the personal data we retain is accurate, complete, and up-to-date. We encourage users to review and update their personal information regularly to ensure its accuracy. Users have the right to request the correction of inaccurate or incomplete personal data.

**d. Security:** We implement appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction while it is being retained. These measures include, but are not limited to, access controls, encryption, and secure storage of data.

**e. Legal and Regulatory Compliance:** We retain personal data in accordance with the applicable laws and regulations in the jurisdictions where we operate. This includes

retaining data for longer periods when required by law or necessary for legal, regulatory, or auditing purposes.

**f. Deletion and Disposal:** When personal data is no longer needed for the purposes for which it was collected or has reached the end of its retention period, we securely delete or dispose of it in accordance with our data deletion and disposal policies. This includes the use of secure deletion methods and, where possible, anonymization or pseudonymization of data before disposal.

## **Legal and Regulatory Retention Requirements**

MASTER WiZR's data retention periods are designed to comply with the legal and regulatory requirements applicable in the jurisdictions where we operate. In order to ensure compliance with these requirements while taking into account our international operations, we consider the following factors when determining our retention periods:

**a. Jurisdiction-specific requirements:** Different jurisdictions may have different data retention requirements for various types of personal data. We carefully review the requirements in each jurisdiction where we operate and establish retention periods that meet the strictest applicable regulations.

**b. Industry standards and best practices:** We take into account industry standards and best practices when determining our data retention periods. This allows us to ensure that we are in line with the expectations of our users and relevant stakeholders, as well as adhering to the principles of data protection and privacy.

**c. Contractual obligations:** In some cases, our contractual relationships with third parties may require us to retain certain types of personal data for specific periods. In these cases, we ensure that our retention periods comply with both our contractual obligations and the applicable legal and regulatory requirements.

**d. Dispute resolution and legal proceedings:** We may need to retain personal data for longer periods in cases where it is necessary for resolving disputes or legal proceedings. In such cases, we retain the data for the duration of the dispute or legal proceeding and any applicable appeal period, or as otherwise required by law.

**e. Ongoing legal and regulatory obligations:** We may be subject to ongoing legal and regulatory obligations that require us to retain certain types of personal data for extended periods. In these cases, we ensure that our retention periods are in compliance with the applicable obligations.

By considering these factors, MASTER WiZR establishes data retention periods that balance the need to comply with legal and regulatory requirements, protect the privacy of our users, and maintain the security and integrity of the data we process.

## **Data Archiving and Storage**

MASTER WiZR is committed to securely storing and managing archived data to protect it from unauthorized access, alteration, or destruction, even as a remote-first company. To achieve this, we have implemented the following measures:

**a. Secure cloud storage:** Archived data is stored in secure cloud storage facilities, which are designed to protect the data from unauthorized access and environmental hazards. These facilities employ robust access control systems and follow stringent security standards to ensure the ongoing security and integrity of the stored data.

**b. Access controls:** Access to archived data is strictly controlled and limited to authorized personnel only, based on their role and responsibilities within MASTER WiZR. Role-based access control (RBAC) is implemented to ensure that employees and users have access only to the data that is necessary for their job functions.

**c. Remote work security:** As a remote-first company, MASTER WiZR has established security policies and guidelines for employees working remotely. These policies include the use of secure connections, strong passwords, and access controls, as well as guidelines for maintaining the confidentiality and security of company data while working in remote environments.

**d. Regular audits and reviews:** MASTER WiZR conducts regular audits and reviews of our data archiving and storage practices to ensure that they remain effective in protecting archived data from unauthorized access, alteration, or destruction. This includes periodic assessments of our storage facilities, access controls, and remote work security policies.

**e. Data backup and recovery:** MASTER WiZR maintains regular data backups and has established recovery procedures in the event of data loss or system failures. This ensures that archived data can be quickly restored in case of any incidents, minimizing the risk of data loss and ensuring the continuity of our operations.

## **Data Deletion and Disposal**

MASTER WiZR is committed to securely deleting or disposing of personal data once the retention period has expired or when it is no longer needed for the stated purposes. To ensure the secure and responsible disposal of personal data, we have established the following processes and procedures:

**a. Data deletion policy:** MASTER WiZR has a formal data deletion policy in place that outlines the criteria for determining when personal data should be deleted or disposed of. This policy takes into account the retention periods defined in this Data Retention Policy and any legal or regulatory requirements that may affect the deletion or disposal of personal data.

**b. Secure deletion methods:** When deleting electronic data, MASTER WiZR employs secure deletion methods that render the data unreadable and irrecoverable.

**c. Physical data disposal:** In cases where personal data is stored in physical formats, MASTER WiZR ensures that the data is securely destroyed using appropriate methods, such as shredding, incineration, or other forms of secure destruction that prevent unauthorized access to the information.

**d. Data disposal documentation:** MASTER WiZR maintains detailed records of data deletion and disposal activities, including the date, method used, and the individuals responsible for carrying out the deletion or disposal process. This documentation serves

as evidence of our compliance with data retention and disposal requirements and helps ensure the ongoing accountability of our data handling practices.

**e. Regular audits and reviews:** MASTER WiZR conducts regular audits and reviews of our data deletion and disposal practices to ensure their effectiveness and compliance with legal and regulatory requirements. These audits and reviews help identify potential areas for improvement and ensure that our data deletion and disposal processes remain up-to-date and aligned with industry best practices.

### **Data Retention Exceptions**

While MASTER WiZR adheres to the general retention periods outlined in this Data Retention Policy, there may be instances where exceptions to these periods are necessary. In such cases, personal data may be retained beyond the general retention periods for specific reasons, including but not limited to the following:

**a. Legal disputes:** If MASTER WiZR is involved in a legal dispute, litigation, or any other legal process that requires the retention of certain personal data, we may retain the relevant data for as long as necessary to resolve the dispute or comply with any applicable legal obligations.

**b. Ongoing investigations:** If MASTER WiZR is conducting an internal investigation, cooperating with an external investigation, or participating in any other investigative process that involves the use of personal data, we may retain the relevant data for the duration of the investigation and any subsequent legal or regulatory actions that may arise.

**c. Regulatory requirements:** MASTER WiZR may be required by law or regulation to retain certain personal data for a specific period of time or indefinitely, depending on the jurisdiction and the applicable legal or regulatory requirements. In such cases, we will retain the data in accordance with the relevant laws and regulations, even if it extends beyond the general retention periods defined in this policy.

**d. Data backup and recovery:** MASTER WiZR maintains secure backups of personal data to ensure the continuity of our services and the ability to recover from data loss or system failures. While we make reasonable efforts to delete personal data from backups once the retention period has expired, some data may remain in backup systems for a longer period due to technical limitations or the need to maintain system integrity.

**e. Other exceptions:** In certain situations, MASTER WiZR may identify other valid reasons for retaining personal data beyond the general retention periods, such as the need to maintain the data for historical or research purposes, or to fulfill specific contractual obligations. In these cases, we will document the reasons for the extended retention and ensure that the data is securely stored and protected for the duration of the extended retention period.

In all cases where personal data is retained beyond the general retention periods, MASTER WiZR will continue to apply appropriate security measures and access controls to protect the data from unauthorized access, alteration, or destruction.

### **Review and Update of Data Retention Policy**

MASTER WiZR is committed to maintaining a comprehensive and up-to-date Data Retention Policy that reflects our data management practices and complies with all applicable legal and regulatory requirements. To achieve this, we have established a process for the regular review and update of our Data Retention Policy, as detailed below:

**a. Periodic review:** MASTER WiZR will review the Data Retention Policy at least once every year, or more frequently as necessary, to ensure its continued relevance and accuracy. This review process will be conducted by a designated team, including members from our legal, compliance, and data protection departments, who will assess the policy against our current data management practices, relevant legal and regulatory developments, and any changes in our business operations.

**b. Policy updates:** If any changes or updates to the Data Retention Policy are deemed necessary during the review process, the designated team will draft the required amendments, and consult with relevant stakeholders within the organization for their input and approval. Once the updated policy has been approved, it will be formally adopted by MASTER WiZR and communicated to all employees and users, as appropriate.

**c. Implementation of changes:** MASTER WiZR will ensure that any changes to the Data Retention Policy are effectively implemented across the organization by updating our internal processes, systems, and documentation, as necessary. This may include modifying our data storage and archiving procedures, adjusting access controls, and providing training and guidance to employees on the updated policy.

**d. Ongoing compliance monitoring:** MASTER WiZR's legal, compliance, and data protection departments will continue to monitor our compliance with the updated Data Retention Policy, as well as any relevant legal and regulatory developments, to ensure that our data management practices remain in line with our policy commitments and applicable requirements.

By maintaining a robust process for the review and update of our Data Retention Policy, MASTER WiZR aims to demonstrate our ongoing commitment to responsible data management and the protection of our users' personal information.

### **User Rights and Choices:**

At MASTER WiZR, we recognize that you have certain rights with respect to your personal data, including the right to access, edit, and delete your information. You also have the right to exercise your data subject rights under applicable laws. We are committed to ensuring that you have control over your personal data, and that you can exercise these rights easily and transparently.

### **Accessing and Editing Your Personal Information:**

You can access and edit your personal information by logging into your MASTER WiZR account and navigating to the appropriate settings. From here, you can view and edit your account information, communication preferences, and other personal data we may hold about you.

### **Deleting Your Personal Information:**

If you wish to delete your personal information, you can request this by contacting us using the details provided in the "Contact Us" section below. Please note that in some cases, we may be required by law to retain certain information for a specified period of time. In such cases, we will inform you of any legal requirements that apply to your data and will work with you to ensure that your rights are respected.

### **Exercising Data Subject Rights:**

Under applicable laws, you may have additional rights with respect to your personal data, such as the right to request access to your data, the right to request that we correct or delete your data, and the right to object to or restrict the processing of your data. If you wish to exercise any of these rights, please contact us using the details provided in the "Contact Us" section below.

### **Data Retention Choices:**

If you have any specific data retention preferences or requirements, please let us know. We will work with you to accommodate your preferences to the extent possible and will ensure that your data is retained or deleted in accordance with applicable laws and our Data Retention Policy.

### **Contact Information:**

If you have any questions, concerns, or requests related to the Data Retention Policy, you can contact MASTER WiZR by:

Email: [info@masterwizr.com](mailto:info@masterwizr.com)

Visiting this page on our website: <https://masterwizr.com/contact>

Phone number: 858-337-9303

We will respond to your inquiry as soon as possible and do our best to address any concerns you may have.