

## DATA RETENTION & ERASURE POLICY

### IPSAA Holdings Private Limited

#### 1. Purpose

This policy outlines how IPSAA Day Care retains and erases personal data in compliance with the Digital Personal Data Protection Act, 2023 and Rules, 2025.

#### 2. Data Retention Periods

| Data Category                         | Retention Period                           |
|---------------------------------------|--------------------------------------------|
| Active Application Form               | Duration of childcare or Minimum 1 year    |
| Processing Logs & Traffic Data        | <b>Minimum 1 year from processing date</b> |
| Financial Records (Billing, Payments) | 7 years                                    |
| Security Logs (Access Records)        | <b>Minimum 1 year</b>                      |

#### 3. What Data We Retain

**For the mandatory 1-year period, we retain:**

- Personal data (child and parent information)
- Consent records and verification documents.
- Processing logs (who accessed what data, when, and for what purpose).
- Enrolment and agreement documentation.
- Emergency contact information.

#### 4. Data Erasure Procedure

|               |                                                                                                                                |
|---------------|--------------------------------------------------------------------------------------------------------------------------------|
| <b>Step 1</b> | <b>48-Hour Notice:</b> Notify parent via email/SMS at least 48 hours before data erasure.                                      |
| <b>Step 2</b> | <b>Check Exceptions:</b> Verify if parent has logged in, contacted us, or exercised rights (if yes, data retention continues). |
| <b>Step 3</b> | <b>Secure Deletion:</b> Delete data from all systems including backups (except where legally required to retain longer).       |
| <b>Step 4</b> | <b>Document:</b> Record date of erasure and maintain deletion log.                                                             |

#### 5. Exceptions to Erasure

We will NOT erase data if:

- Retention is required by law (e.g., Income Tax Act requires 7 years for financial records).
- Parent has contacted us or exercised rights within the retention period.

- Data is subject to ongoing legal proceedings or investigations.
- Parent has explicitly requested longer retention or the services are still ongoing or renewed.

## 6. Responsibilities

|                                |                                          |
|--------------------------------|------------------------------------------|
| <b>Data Protection Officer</b> | Oversee compliance with retention policy |
| <b>IT/Operations Team</b>      | Execute data deletion and maintain logs  |
| <b>All Staff</b>               | Report data retention issues to DPO      |

## 7. Policy Review

This policy will be reviewed annually and updated as necessary to ensure compliance with applicable laws and regulations.

*Version: 1.0*