

EEK & SENSE Pty Ltd Data Retention Policy

1. Introduction

This Data Retention Policy has been created by EEK & SENSE Pty Ltd in order to set out the principles for retaining and destroying personal data that is collected and held by us in the course of our business operations and the delivery of our services to clients.

This policy should be read in conjunction with other policy documents that have as their objectives the protection and security of data including:

- ◆ EEK & SENSE Privacy Policy
- ◆ GLWS Data Protection Information Sheet
- ◆ GLWS Data Security Information Sheet
- ◆ EEK & SENSE Internal IT Security Policy

2. Obligations and Principles specific to Personal Data collected in the GLWS

2.1 As outlined in the EEK & SENSE Privacy Policy, we collect various kinds of personal data necessary for our legitimate business interests (the delivery of wellbeing services to clients). This includes special categories of personal data regarding health and wellbeing which is collected via the GLWS survey.

How we protect and secure this data is covered in other documents (as above).

Our approach to the retention of the GLWS data is determined by two factors:

- 1) Ensuring that we retain the data for a sufficient period to deliver our services to clients
- 2) Ensuring that we de-identify this personal data as soon as possible to minimise any negative consequences for individual respondents and their organisations from any data breach

2.2 Retaining data to deliver services

The GLWS is a measurement of wellbeing which is a changeable and dynamic construct, influenced by external events and circumstances. Hence the responses given by an individual at one point in time will cease to have validity relatively quickly.

Our position on this is that after 6 months, the GLWS response data should not be relied upon as an accurate reflection of the individual's wellbeing and we recommend a re-assessment after this period. However, when aggregated with the responses from other employees from the same organisation, this aggregated perspective of wellbeing can yield useful insights for the organisation for a longer period than 6 months. Hence in order to allow for the potential use of the individual data for this purpose, we retain the fully identified GLWS data for a period of 18 months.

In the event that an organisation or team has created a GLWS Team/Group report using the aggregated personal data as above, this report will be retained for 24 months (to enable tracking of changes in a group or team's progress from one year to the next).

2.3 De-identification of GLWS respondent data

As above, by default, all GLWS respondent data will be de-identified 18 months after completion of the GLWS survey. This means that name, email address and organisation name are removed from the data, rendering this anonymous. At this point, the data ceases to be 'personal' data and becomes the intellectual property of EEK & SENSE.

At any point in the period from GLWS completion to 18 months later, the individual respondent can request the de-identification and/or deletion of their personal data and this will be implemented within 14 days of EEK & SENSE receiving a written request.

2.4 Group based GLWS data

As above, one use of the GLWS data is to create GLWS Team or Group reports which aggregate the GLWS survey data from a number of individuals. These reports do not name any individuals but they do typically name the organisation and or team/group that the data relates to.

In order to protect these organisations from the risks of a data breach, all GLWS Group and Team reports will be deleted no later than 24 months after creation.

2.5 Liability

This policy describes the actions to be taken with respect to the retention and de-identification or deletion of GLWS data held by EEK & SENSE Pty Ltd. This includes the data held on the survey platform, which is owned and managed by a third party provider Formation Systems Pty Ltd.

In the course of our business operations we provide GLWS data in the form of GLWS Personal, Team and Group reports to our GLWS accredited coaches. All accredited coaches sign detailed Terms and Conditions of Use which include shared responsibilities for data protection. However, EEK & SENSE do not accept any responsibility or liability for the protection, security and retention of this GLWS data by the GLWS Accredited coaches after it has been provided to them.

3. Obligations and Principles specific to Personal Identity and Contact Data

The identity and contact data (names and email addresses) provided to EEK & SENSE for the purpose of sending out GLWS invites) is deleted within 6 months of completion of the survey (unless the respondent opts in to receive ongoing communications from EEK & SENSE).

As in most businesses today we collect personal contact and identity data (names, email addresses, telephone numbers) in order to provide information and services to clients. Our approach to the management and retention of this form of data (including data subject's legal rights with respect to this data) is covered in the EEK & SENSE Pty Ltd Privacy Policy.

4. Questions

Any questions about this data retention policy, including any requests by client organisations or individual respondents for any variations to this policy should be directed to:

The Privacy Officer, EEK & SENSE via admin@glswellbeing.com