DATA DESTRUCTION POLICY

1. Overview

1.1. For the purposes of its contractual relationship with its CoolCare software Customers, CoolCare Limited ('CoolCare') is the data processor and the Customer is the data controller.

1.2. CoolCare recognises that Customers using CoolCare may require some of their protected data to be destroyed when it is no longer required, to comply with its legal and regulatory obligations.

1.3. Equally CoolCare recognises that the untimely disposal of Customer records could affect:

1. their business activities;
2. their ability to defend or initiate legal proceedings;
3. their ability to comply with statutory obligations.

1.4. This document provides the policy framework through which CoolCare will effectively manage data destruction requests from CoolCare Customers in a manner which is not only transparent and capable of being audited, but also in a way that ensures the Customer fully understands the consequences of data destruction being carried out.

2. Scope of the policy

2.1. This policy applies to all data stored in CoolCare databases for its Customers. This data is created, stored and maintained electronically in databases controlled by CoolCare.

3. Responsibilities

3.1. CoolCare, as a Data Processor, has a responsibility to secure its Customers' data in accordance with regulations and respond to assist with Data Destruction requests within a reasonable timeframe. The inserting, editing, processing and deletion of individual records that are stored in CoolCare is the responsibility of the CoolCare Customer as they are the Data Controller.

4. Locations of Data Storage

4.1.1. Customer Database: The primary storage location of all data input into CoolCare is the 'Customer Database', this is the live location of the data and all additions, amendments and deletions performed using CoolCare are actioned immediately in this location. This is the only location where Customers can directly view or change their data.

4.1.2. Cloud Database Backup: A copy of the Customer Database is made nightly to a 'Cloud Backup', this contains all of the data held in the Customer Database at the time the backup is run. The backup is compacted into a single file and requires specialist software to view the data held within. These backups are retained for 2 years. The backups are replicated to multiple locations within the UK.

4.1.3. Cloud VM Backup: A snapshot copy of the Virtual Machine Server which houses the Customer live Database is taken each night and stored within our Cloud environment. The snapshot is compacted into a single file and requires specialist software to restore. Each of these backups are retained for 35 days. The backups are replicated to multiple locations within the UK.

5. Types of deletion within CoolCare

5.1.1. Hard Delete: These deletions performed within CoolCare fully remove the data from the Customer Database (location described in 4.1).

5.1.2. Soft Delete/Archive: Certain deletions will remove options or data from CoolCare for any future interactions and prevent the data from being viewable within the CoolCare application by any users, however in order to maintain the integrity of the database and ensure CoolCare continues to run correctly the data may still reside in the Customer Database.

6. Destruction Performed by the Customer

6.1. Where data deletion is possible and achievable within a reasonable timeframe by using the CoolCare platform, this should be done by the Customer. The details of which data is deletable by the Customer by using the CoolCare platform is listed in the Data Deletion Types table in section 8, in other cases a request can be made to CoolCare for the data to be deleted.

6.2. In cases where the Customer would like to permanently delete data themselves and the system allows it, they may do so without consulting CoolCare. The Customer should be aware that they may be deleting data and documentation that they are required to keep by law. Please take legal advice where necessary.

6.3. When Customers 'hard delete' data from their own database this is immediately removed from their Database, if the data was entered prior to the most recent backup the data will still reside in the immutable backup files described in 4 for the durations listed.

6.4. It may be possible for CoolCare to retrieve deleted data from within these backup files, though this would only ever be carried out with receipt of a written request by a sufficiently authorised employee of the Customer.

7. Data Destruction Requests

7.1. Where the Customer has a requirement to delete protected data to comply with regulations and this is not possible within a reasonable timeframe by using CoolCare, Customers may submit a Data Destruction Request to CoolCare.

7.2. The request must be made in writing, by an authorised representative of the Customer.

7.3. Upon receipt of a request CoolCare will inform the Customer of any direct or indirect impacts this deletion will have that may not have been immediately obvious to the Customer as well as any amendments to data that are required to ensure the system will still be usable after the deletion.

7.4. The Customer will be informed that the data will remain in the immutable system back-ups as it would take an unreasonable amount of time to remove the data from each of these. If during the period of backup retention, a restore from these backups is made, then the deleted data will be restored.

7.5. Once the Customer has confirmed they understand the impact of the deletion and still consent for us to go ahead with it, we will inform the Customer of the estimated timescale of carrying out the deletion.

7.6. Data Destruction Requests may be for single specific records, multiple specific records or be formulaic (e.g. Delete all discharged residents who's discharge date is greater than 7 years old).

7.7. Data Destruction Requests must be on an individual basis, they may not repeat automatically.

7.8. Some data cannot be deleted because it is intrinsically linked to other data in the system and its removal could cause other data to become inaccessible, in these cases CoolCare cannot delete this data. Any request for such deletions will receive an explanation for the reasons as to why the request cannot be carried out as well as any potential suggestions for an alternative way of complying with GDPR in the specific instance.

8. Data Deletion Types

Data Type	Deletion Methods Available
Staff	Individual records can be deleted through the interface. Mass deletions should be done through Data Destruction Requests.
Residents	Individual records can be deleted through the interface. Mass deletions should be done through Data Destruction Requests.
Enquiries	Individual records can be deleted through the interface, this will not delete any associated residents which have been created. Mass deletions should be done through Data Destruction Requests.
Other	Other areas of the system allow specific pieces of data to be deleted by the user, some are hard deletes and some soft/archive. If the Customer

	requires any of this data to be deleted they should contact our Support Team to request details on that specific data.

9. Chargeable Data Deletion

9.1.1. In instances where a customer is able to delete data themselves but would prefer that CoolCare perform the work, for example to save time, CoolCare retain the right to charge for this service.

9.1.2. Once an estimate for the amount of time it will take CoolCare to perform the action has been estimated, the customer will be made aware of the cost for the work to be carried out and will have the option to choose either this premium option or to perform the deletion themselves free of charge using CoolCare.

Date	Created/Reviewed By	Comments/Updates Made
18.04.2023	Peter Nicholson	Annual Review
05.05.2024	Peter Nicholson	Annual Review, no changes.