

DATA PORTABILITY

1. Overview

- 1.1. For the purposes of its contractual relationship with its CoolCare software Customers, CoolCare Ltd is the data processor and the Customer is the data controller.
- 1.2. CoolCare recognises that when a customer cancels their CoolCare subscription, CoolCare must provide a legible backup of the Customer's existing data. CoolCare will also provide a guide which explains one possible way to access this raw data without using the CoolCare software. Once this data has been provided to the Customer, CoolCare will then need to delete the data from its own servers in order to comply with its legal and regulatory obligations, please refer to the Data Deletion Policy for further information on this process.

2. Scope of the policy

- 2.1. This policy applies to all customer data stored within CoolCare3 and CoolCare4 databases. This data is created, stored and maintained electronically in databases controlled by CoolCare Ltd.

3. Responsibilities

- 3.1. CoolCare Ltd, as a Data Processor, has a responsibility to secure its Customers' data in accordance with regulations and to provide a copy of this data to the customer when the subscription has been cancelled. It is the responsibility of the Customer, as a Data Controller to acknowledge receipt of the data copy provided by CoolCare within 7 days of CoolCare providing it. CoolCare will delete the customer data from its own servers once confirmation is received that data has been received by the customer.

4. Types of Data Portability Formats

- 4.1. Cloud-based File Transfer Service: This method can be used to provide the customer with their data by using file transfer services such as WeTransfer. This will generate an email to the customer containing a link to download the file. This link remains live for 7 days to allow time for the customer to download their data.
- 4.2. Disc Format: CoolCare where necessary can write the customer's data to a DVD, which will be sent via recorded delivery via Royal Mail. Confirmation from the customer will be required once the disc is received.

5. Customer Access to CoolCare Data

- 5.1. Customers will be provided with a Data Portability Guide along with the copy of their data, which provides instructions on how to access the data stored in the file received.
- 5.2. CoolCare is unable to provide further support to CoolCare customers after they have cancelled their subscription. If customers require support in order to access the data, they should seek support from their IT support team.

Date	Created/Reviewed By	Comments/Updates Made
12.06.19	Fiona Hale	Reviewed

07.10.22	Fiona Hale	Reviewed, no changes