Divinia, Inc.

Data Retention Policy

1. Definitions

- **Personal Data**: any information relating to an identified or identifiable natural person (a "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Sensitive Personal Data**: Special subset of "Personal Data" category: data includes, but is not necessarily limited to, details of the data subject's race, ethnic background, politics, religion, trade union membership, genetics, biometrics (where used for identification purposes), health, sex life, or sexual orientation. However, under normal circumstances Divinia is not expecting itself to handle any sensitive personal data based on the nature of the business of Divinia in the foreseeable future.
- **Contract Duration**: The Contract Duration is the length of time measured in months from the date a contract or agreement is executed between Divinia and any client or relevant third party and the date such contract or agreement is terminated.

2. Data Subject Rights

- All personal data held by the Company is held in accordance with the requirements of the applicable laws and data subjects' rights, as set out in this policy.
- Data subjects of applicable jurisdictions are kept fully informed of their rights, of what personal data the Company holds about them, and how that personal data is used. If Divinia is a data processor for the specific personal data, then the corresponding data controllers are subject to inform data subjects the usage of their data by Divinia as a vendor.
- Data subjects of applicable jurisdictions have the right to e.g. 1). have incorrect data rectified, 2). Request the deletion of their personal data. If Divinia is a processor for the specific personal data, the request may come from the data controller (in this case the client of Divinia).

3. Data Storage,Transfer Disposal

- All personal data will be stored and transferred in encrypted form, as further specified in Divinia B2B Privacy Notice.
- When data is expired according to the data retention policy or individual contract, or when the data subject exercises their right to have their personal information

deleted. The data disposal process shall be done securely. If there is personal data stored in hard copy, the hard copy shall be shredded and recycled.

4. Default Data Retention Periods for Divinia as Data Processor

- The following retention period profiles are in effect when Cake acts as a Data Processor on behalf of any third party who qualifies as a Data Controller. These are default values that may only be changed through a special request and payment for all necessary engineering steps.
- **Personal Data**: For no longer than 18 months after last contact or contract duration.
- **Sensitive Personal Information**: 12 months

5. Default Data Retention Periods for Divinia as Data Controller

- **Personal Data**: For no longer than 18 months after last contact or contract duration.
- **Sensitive Personal Information**: 12 months

Effective 01/2021