



# Information Deletion Policy

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HT-ISMS-PL-22

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## 1. Introduction

HackTech collects and processes a substantial amount of information during its business activities and has a responsibility to always protect that information. However, due attention must be paid to the end of the life cycle of that information, specifically where it is no longer required for operational, legislative, or other reasons, and so may be safely deleted.

## 2. Purpose

The purpose of this policy is to define the principles and procedures for the secure and compliant deletion of information that is no longer required for operational, legislative, or other justifiable reasons.

## 3. Scope

This policy applies to all systems, people, and processes that constitute the organization's information systems, including board members, directors, employees, suppliers, and other third parties who have access to HackTech systems.

## 4. Information Deletion Policy

### 4.1 General Policy

It is HackTech policy to delete information that is no longer required for operational, legislative, or other justifiable reasons.

### 4.2 Consideration for Anonymization

Consideration must be given to whether information may be useful to the organization in an anonymized form, as defined in the Data Masking Policy.

### 4.3 Methods of Information Deletion

Methods of information deletion may vary according to the storage medium and include:

- Automated deletion after a specified period (e.g., for email)

### 4.4 Selection of Deletion Methods

Care must be taken to ensure that the most appropriate method of information deletion is used according to the circumstances, including the sensitivity of the information involved.

#### 4.5 Evidence of Deletion

Where possible, evidence of the deletion of information (e.g., audit logs) must be recorded and retained for a specified period.

#### 4.6 Third-Party Deletion

In cases where deletion is carried out by a third party, a relevant certificate or similar attestation of completion must be obtained.

#### 4.7 Compliance with Privacy Legislation

The use of information deletion techniques must always take account of HackTech compliance obligations under relevant privacy legislation.

#### 4.8 Deletion Requests under Privacy Law

Where information is to be deleted because of a legal request by a PII principal under relevant privacy law, care must be taken to ensure that the information involved is deleted from all locations in which it is held, including those of processors and sub-processors.

#### 4.9 Due Diligence for Cloud Services

For information held in third-party cloud services, due diligence must be carried out prior to contract signing to confirm that information deletion methods meet HackTech requirements.

#### 4.10 Audits for Sensitive Information

For information that is classified as very sensitive, periodic audits must be carried out to confirm that procedures have been followed correctly, and that deleted information cannot be recovered. It may be appropriate to use a third-party supplier with specific expertise in this field for this purpose.

### 5. Conclusion

By adhering to this information deletion policy, HackTech aims to ensure the secure and compliant deletion of information that is no longer required, thereby mitigating risks associated with data retention and maintaining compliance with legal and regulatory requirements. This approach helps protect the organization's information assets and reinforces trust with stakeholders.