# Customer Data On Termination Policy

## PHX051

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# Purpose Of This Policy

Data protection is a priority for Phoenix Software Ltd both during the term of a contract and following its expiry. This policy provides the outline steps to be taken with regard to the return and/or disposal of a Customer's data held within Phoenix's systems following the termination and/or expiry of a contract.

# Intended Audience

This policy applies to all members of staff that access data within Phoenix Software Ltd and customers who have data held within Phoenix Software Ltd.

# Commencement

Upon either receipt of a notice of termination or the natural expiry of a customer contract, Phoenix shall as soon as reasonably practicable commence an audit of the Phoenix systems where customer data may be potentially held and develop a working list of all depositories and the items of customer data stored within. This document will be used as the guide for data retrieval and recovery.

Alongside the identification of customer data, a contract review will be performed to review and confirm the definition of Customer data and also if any actions regarding the return or destruction of customer data have been pre-agreed. In the absence of any pre-agreed actions, Phoenix shall request instruction from the customer regarding data return or destruction.

# Coverage

The typical repositories for Customer data in the current Phoenix estate are as listed below and these are the areas that Phoenix will interrogate to identify and locate customer data:

- Exchange
- Network Drives
- Office 365
- Microsoft Teams
- Microsoft SharePoint
- Oasis
- Sage
- Site24x7
- CloudHealth
- Zendesk

# Timescales

Phoenix shall refer to the specific contract which is subject to the termination or expiry and shall work towards any timescales set out within for the return and/or destruction of customer data. In the absence of any defined timescales, Phoenix shall use reasonable endeavours to complete customer data return and/or destruction within 30 working days from the termination or expiry of the contract.

# Notification to Customer

As a first step, Phoenix shall refer to the contract subject to the termination and/or expiry to confirm the customer notification requirements. Typically, as part of any Phoenix acknowledgement of a customer's notice of termination there would be a statement included to the effect that Phoenix would commence data return/destruction.

In the absence of any requirements or further instruction from the customer, Phoenix shall send notice to the customer confirming either the return or destruction (or a combination of both), typically within 5 working days of the completion of the data activity.

# Plan

It is usual practice that the return and/or destruction of data will be an activity which is integral to an overall Exit Management Plan which is agreed with the customer. Progress on customer data return/destruction will be included within the exit status report communicated to the Customer by the Phoenix exit plan Project Manager. In order for consistency Phoenix would propose that all communication regarding customer data return or destruction will be via the appointed Exit plan manager.

# Version Control

| Author | Version | Date | Description |
|--------|---------|------|-------------|
| ISC | 1.0 | 27/07/2020 | Original Document |
| ISC | 1.0 | 01/08/2021 | Annual review – no changes |
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# Document Approval

| Name | Version | Date | Position |
|------|---------|------|----------|
| Clare Metcalfe | 1.0 | 27/07/2020 | Operations Director |
| Clare Metcalfe | 1.0 | 01/08/2021 | Operations Director |
| Clare Metcalfe | 1.0 | 02/05/2023 | Operations Director |

Signed:  *Clare Metcalfe*  Clare Metcalfe, Operations Director

Dated: 02/05/2023