

Personal Data Erasure Policy



CLASSIFICATION: INTERNAL

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1. Definitions and Acronyms

Definitions

Term	Explanation
Information Asset	Anything that has value to the organisation and is either a form of information itself or creates, stores, transmits, or manages information.
Information Security	Preservation of confidentiality, integrity and availability; in addition, other properties such as authenticity, accountability, non-repudiation, and reliability can also be involved
GDPR	General Data Protection Regulation
Writer Relocations Employee	Person hired to perform a job or service for Writer Relocations, and one who is directly employed or hired on a contract basis
Customers	All the clients of the organisation who avail services or products provided by the Writer Relocations.
Third parties	All third parties which include, but is not limited to vendors, related government authorities, shipping line, airline, partners, volunteers, contractors, consultants, temporaries, and others who have access to, support, administer, manage, or maintain Writer Relocation's information or physical assets
Data Protection Officer (DPO)	A data protection officer (DPO) is an enterprise security leadership role required by the General Data Protection Regulation (GDPR). Data protection officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.
Data Protection	Data protection is the process of protecting data and involves the relationship between the collection and dissemination of data and technology, the public perception and expectation of privacy and the political and legal underpinnings surrounding that data. It aims to strike a balance between individual privacy rights while still allowing data to be used for business purposes. Data protection is also known as data privacy or information privacy.
Data Breach	A data breach is a confirmed incident in which sensitive, confidential or otherwise protected data have been accessed and/or disclosed in an unauthorised fashion. Data breaches may involve personal health information (PHI), personally identifiable information (PII), trade secrets or intellectual property
Data Processor	The entity that processes data on behalf of the Data Controller.
Data Controller	The entity that determines the purposes, conditions and means of the processing of personal data.
Data Subject	A person whose personal data is processed by a controller or processor
Consent	Freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data

Acronyms

Acronym	Full Name
DPO	Data Protection Officer
GDPR	General Data Protection Regulation
CISO	Chief Information Security Officer
DC	Data Controllers
DP	Data Processors
DS	Data Subject

Acronym	Full Name
BCR	Binding Corporate Rules

2. Scope

This policy is applicable to data captured by the SBU Writer Relocations of Writers Business Services Pvt. Ltd. directly or indirectly from data subject.

3. Data Processor

The SBU - Writer Relocations of Writers Business Services Pvt. Ltd. is the Data Processor as per the General Data Protection Regulation, which means that it carries out processing of data as per their client required services based on the collected data.

It is also responsible for notifying their clients in case any data breach takes place.

4. Data Controller

The SBU - Writer Relocations of Writers Business Services Pvt. Ltd. is the Data controller as per the General Data Protection Regulation, which means that it determines the purposes, conditions and means of the processing of personal data which is collected from the products while providing demo and employee data.

5. Purpose

The purpose of this policy is to highlight the handling of data requests from the respective subjects.

6. Policy Statement

6.1 DEFINING DATA ERASURE

Data erasure is the process of erasing data stored on various types of electronic media so that it is completely inaccessible.

Physical copies of the forms having personally identifiable information of how the data subjects should be shredded.

Under article 17 of the GDPR, individuals have the right to have their personal data erased. This is also known as “Right to be forgotten”. This means that all the personal data of the data subject which is with the organisation for processing (i.e. providing services) shall be erased/deleted.

6.2 DEFINING CATEGORIES OF PERSONAL DATA

Linked Information:

- Name (full name, maiden name or alias)
- Home address
- Email address of the data subject
- Date of birth
- Telephone number
- Personal identification numbers (e.g.: social security number (SSN), license number, passport number, bank account number, credit or debit card account numbers personal identification numbers (PIN))

- Personal documents (e.g.: employment contract, tax documents)
- Biometric data (fingerprint or voice print, retina scans, voice signatures, DNA or facial geometry)
- Log in details
- Device IDs
- IP addresses
- Browser Type
- Language Preference
- Time zone
- Screen size, screen color depth and system fonts

Linkable information:

- Place of birth
- Gender
- Race or Religion
- Business email address
- Social media reviews, testimonials and ratings
- Religious or philosophical beliefs
- Trade-union membership details
- Political opinions
- Information related to health

6.3 TYPES OF PERSONAL DATA Writer Relocations COLLECTS

Writer Relocations collects personally identifiable information from website:

- Name (first name, last name)
- Email address
- IP address
- User operating system & Browser version
- Cookies

Writer Relocations collects personally identifiable information from product(demo):

- Name
- Email address
- Scanned copy of passport & VISA
- Residential address
- Residential permit
- Destination address
- Ticket copy
- Local registration documents
- Birth Certificate

- Contact Number

6.4 DATA ERASURE APPLIES WHEN

Data subjects can exercise the right to be forgotten when any of the following applies but not limited to:

- Personal data is no longer necessary for which it was originally collected or processed
- Personal data is used for marketing purpose without the consent of the data subject
- Personal data is collected and processed without the consent of the data subject
- Data subject has withdrawn the consent
- Because of recent breach, data subjects have withdrawn consent

6.5 DATA ERASURE MAY NOT APPLY WHEN

Data erasure requests might not apply under following circumstances but not limited to:

- To meet legal and compliance requirements
- The “right of freedom and expression”
- For supporting legal claims

6.6 DATA RETENTION

Writer Relocations holds the data subject’s personal data on the systems for the purpose it has collected, once the purpose is fulfilled the personal data of the respective subjects shall be deleted. Data retention period would be 3 years.

6.7 DATA ERASURE REQUESTS

Writer Relocations will provide data subjects to exercise the “right to be forgotten” by providing them an option to request for data erasure in the application.

Writer Relocations will also provide data subjects to exercise the “right to be forgotten” by providing them an option to request for data erasure via email.

Once Writer Relocations receives request for deletion from the data subjects, personal data of the subjects will be taken out of the processing batch immediately and subsequently deleted within a month (30 days).

6.8 RESPONSIBILITY OF DATA ERASURE

It is the responsibility of the Writer Relocations IT team to remove data subject’s personal data from processing immediately and erase the data.

It is the responsibility of Writer Relocations business team to shred the stored physical copies of personal data.

6.9 NOTIFICATION OF ERASURE OF PERSONAL DATA

Writer Relocations shall be notifying the data subjects about the erasure of their personal data immediately after deleting data subject’s personal data from the processing.

7. Enforcement

Necessary disciplinary action will be taken against any employee not following the policies and procedures laid down by Writer Relocations. Any employee found to have violated or not practicing his/her role may be subject to disciplinary action, up to and including termination of employment as per the Writer Relocation's HR policies.

8. References

- General Data Protection Regulation (2016)

9. Appendix A: Data Erasure Notification Form

Data Erasure Notification Form	To be filled when notifying the data subject
Date of request for erasure from the data subject	
Name of the data controller	
Name of the data processor	
Name of the data subject	
Email address of the data subject	
Information held by Writer Relocations of the data subject	
Information deleted by Writer Relocations upon the data subject's request	
Date of erasure of data	
Date of notifying the data subject	
Mode of notification (Email/Post)	
Reason for delay (If any)	