



INTEGER WEALTH GLOBAL

Policy Document

Data Deletion

Issue: March 2024

1. Purpose

This Data Deletion Policy establishes the framework under which Integer Wealth Global (IWG), a European-based financial services and investment management company registered in **Luxembourg, Liechtenstein, Gibraltar, and Cyprus**, securely deletes personal and business data. The policy ensures compliance with applicable data protection laws, including the **General Data Protection Regulation (GDPR)**, and maintains the trust of clients, partners, and regulators.

2. Scope

This policy applies to:

- All personal data and client records processed by IWG.
- Digital and physical data stored in IWG's systems, databases, servers, and third-party platforms.
- Employees, contractors, and third-party service providers handling data on behalf of IWG.

3. Principles of Data Deletion

- **Lawful Basis:** Data is retained and deleted in accordance with contractual, regulatory, and legal obligations.
- **Minimal Retention:** Data is only retained for as long as necessary to fulfil business, contractual, and compliance requirements.
- **Secure Deletion:** Data is erased in a manner that prevents recovery or misuse.

4. Retention Periods

- **Client Data:** Retained for the duration of the business relationship and up to **7 years** thereafter, in line with financial regulatory requirements.
- **Regulatory Records:** Retained for periods specified under applicable financial regulations in Luxembourg, Liechtenstein, Gibraltar, and Cyprus.
- **Employee Data:** Retained for the duration of employment and up to **6 years** post-termination, unless longer retention is legally required.
- **Marketing Data:** Deleted within **30 days** upon withdrawal of consent.



5. Data Deletion Procedures

- **Digital Data:**
 - Secure overwriting and erasure methods are applied.
 - Backups containing expired data are permanently purged on the next scheduled backup cycle.
- **Physical Records:**
 - Shredding and secure disposal of hard-copy documents.
 - Certificates of destruction are obtained where third-party disposal services are used.

6. Data Subject Rights

In accordance with GDPR, data subjects may request deletion of their personal data (“right to be forgotten”). Requests will be assessed, and data will be erased within **30 days**, unless retention is legally required.

7. Responsibilities

- **Data Protection Officer (DPO)** oversees the enforcement of this policy and ensures compliance with EU and national data protection regulations.
- **Employees** are required to follow secure deletion protocols when handling client or company data.
- **Third-Party Providers** must comply with IWG’s contractual data deletion requirements.

8. Exceptions

Data may be retained beyond stated retention periods where:

- Required by law or financial regulators.
- Necessary for the establishment, exercise, or defense of legal claims.

9. Policy Review

This policy will be reviewed annually, or earlier if required by regulatory changes or business needs.