

### **Data Retention Policy**

The General Data Protection Regulation (GDPR) mandates that patients and third parties are informed of the retention timetable for data, as well as the rationale.

In common with other independent hospitals and care providers, Cosmetic Associates Limited maintains a 30 year retention policy. The rationale for this is as follows:

- a) Records of surgery remain valuable to patients in case of a follow-up at a later stage. A percentage of patients return for further surgical intervention, and as such, it is extremely helpful to have records on hand.
- b) In case of any complaints raised, these records are necessary for the consultant to defend himself.
- c) Most commonly, patients request this information for further treatment elsewhere.

At the same time, it is key to acknowledge that longer data retention plans increase the risk of data breaches. To this end, our records of patient data are securely stored (as laid out in detail in our compliance plan).

Some examples of this data protection approach include:

- 1) Encrypting emails and messages sent between health care providers and Cosmetic Associated Limited;
- 2) Keeping all files pertaining to patients in secure locked locations;
- 3) Ensuring that computers have strong passwords and are patched up to date in order to mitigate the risk of vulnerabilities.