

# **Data Retention Policy**

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## 1. INTRODUCTION

Advantech Europe B.V. or Advantech Poland Sp. Z o o (“Advantech”) holds a great deal of information that is crucial to the running of its daily business operations. This is why the business-critical data that resides in electronic and hard copy forms must be suitably protected. This involves considerations as to the confidentiality, integrity, and availability of business critical and potentially sensitive data. The business-critical data may contain personal data.

The following policy is designed to fit the General Data Protection Regulation (the “GDPR”) requirements, and ISO 27001 standard and will be reviewed and updated regularly to ensure that it remains appropriate in the light of any changes to legal, contractual, or acceptable use obligations.

## 2. THE PURPOSE OF DATA RETENTION POLICY

The purpose of this Data Retention Policy is to provide guidance on the retention of the various types of data Advantech holds. This document strives to balance the need to store information so that it can be accessed for as long as it is needed with legal obligations to destroy the data safely when it is no longer required.

The GDPR imposes obligations on Advantech, as a data controller, to process personal data in a fair manner, and to retain the data for no longer than is necessary to achieve its purposes.

Taking the previously mentioned into account, Advantech has over-arching information security and data protection objectives to endeavor that:

- information is only held for only as long as necessary, giving due regard to the legal, regulatory, business and individual needs
- records are stored in a manner which is appropriate to their purpose;
- records are accurate and kept up-to-date; and
- time-periods for retention, are discussed, agreed and documented; and at the point of destruction, appropriate procedures are followed.

## 3. SCOPE OF DATA RETENTION POLICY

The following policy will apply to two key types of data that Advantech holds: the company’s data and the customer’s data (“Records”). Records can also contain information and personal data in various forms. It may be on paper, stored electronically or held on other media. It includes text, pictures, audio, and video.

It covers information transmitted by post, by electronic means, including telephone and voicemail. It applies throughout the lifecycle of the information from creation through storage and utilization to disposal.

This Data Retention Policy applies to all Advantech controlled companies and branches operating within the European Union. Appendix I attached to this Policy will state all the relevant retention periods applicable to different Records and depending on each Advantech controlled entity within the EU.

Since retention requirements may vary from country to country, there can be a specific local document retention practice, which supplements this global policy. It is the responsibility of regional and local management to ensure compliance with this Data Retention Policy and local document retention requirements.

#### 4. GENERAL RETENTION AND STORAGE RULES

Records must be retained in an orderly manner, either in physical files or in electronic form on a server or cloud-based storage. Records should be accessible within a reasonable timeframe and be appropriately indexed to facilitate internal or external review.

Records must be retained securely to avoid unauthorized access or inadvertent destruction. Where records are stored off-site, appropriate access and recovery procedures are required. Secure storage includes locked file cabinets, password-protection, or encryption of documents.

Records should not be retained for longer than required in accordance with respective local laws, regulations, and industry practices.

#### 5. STORAGE OF CONTRACTS IN PAPER OR ELECTRONIC FORM

Contracts may be stored in electronic form only, provided:

- the contract's integrity can be guaranteed;
- local law does not require a physical format; and
- the author can be identified.

These criteria are necessary to preserve the value of the document in case required as evidence. As a rule, the greater the value or materiality of a contract, the greater the desirability to retain a paper original. Contracts under seal or requiring notarization or legalization need to be retained at least for the relevant retention period in hardcopy form.

#### 6. EMAIL AND ACCOUNT RETENTION

The content of most emails, whether internal, incoming, or outgoing, does not constitute a formal Record. However, it is recognized that in the event of a dispute with a customer or supplier, email records may be useful in confirming the parties' intentions.

Employee mailboxes and user accounts are deleted upon termination of employment, following the offboarding process. Data that needs to be retained (e.g., for legal or audit reasons) may be transferred to secure storage before deletion.

## 7. PERSONAL DATA RETENTION POLICY

Personal Data (as defined within the GDPR) should only be retained for the period "necessary" to achieve our processing purposes.

Therefore, for each processing activity the following should be considered:

- whether any legal or regulatory requirements specify a retention period for Personal Data to be processed;
- how long Advantech will need to retain Personal Data in relation to the proposed processing activity; and
- whether the duration of the proposed retention period is necessary for the purposes of the relevant processing activity.

The retained data should be subject to periodic reviews every 6 months with an aim of identifying the data that should be deleted.

In case of Advantech's customers, and as already described in the Privacy Statement published online, all personal data processed is kept for an additional period of 5 years after the termination of the business cooperation, or longer depending on statutory requirements of each country Advantech operates in.

## 8. DESTRUCTION

Before any Records are destroyed, they should be reviewed to ensure Records that need to be retained beyond the scheduled retention date are not destroyed and that an appropriate method of disposal is selected.

Advantech Data Protection Officer is responsible for the process of identifying Records that have met their required retention period and supervising their destruction. The destruction of personal data, confidential, financial, and personnel-related records must be conducted by shredding. The destruction of electronic records must be coordinated with the IT Department.

Any documents subject to litigation hold must not be destroyed.

## 9. Validity and document management

This document is valid as of 2025.6.2.

The owner of this document is Data Protection Officer, who must check and, if necessary, update the document at least once a year.

A handwritten signature in black ink, appearing to read "John Doe".

RTA van Velzen

CM&D Director Europe

02/06/2025



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## **Policies and Procedures**