TIME DOCTOR

DATA RETENTION AND DELETION PROTOCOL

This document sets out Time Doctor's approach to the retention and deletion of Customer Data. As set out below, Time Doctor's deletion protocols vary depending on the nature of the account the Customer ("you") has and the action (or inaction) you take.

Capitalized terms used but not defined in this Data Retention and Deletion Protocol have the meaning given to them in the Time Doctor Terms of Service.

Standard data retention periods for Customer Data

• Paid-for-Accounts

Time Doctor retains Customer Data in connection with its Paid-for-Accounts on a rolling two-year basis. This means that two years following the creation of the Customer Data within the Time Doctor Service, it will be automatically deleted respecting the deletion procedure approved internally. You can export Customer Data in the form of a report at any time prior to automatic deletion. Further details on these options are set out below.

<u>Trial Accounts</u> – at the end of a trial period, Time Doctor retains Customer Data for a
period of 180 days. We do this in order to provide continuity to Customers who wish to
upgrade to Paid-for-Accounts or Freemium Accounts. If you do not open a Paid-forAccount or Freemium Account with Time Doctor within this period, we will classify your
account as "dormant" (see below) and your Customer Data and account will be deleted.

Upgrading Plans and Access to Historical Data

Upgrading to a higher plan grants access to historical data beyond your current plan's standard retention period. Data is not deleted but becomes visible when accessing a higher-tier plan.

Deletion of Customer Data (during the lifetime of an account)

Customers can delete Customer Data at any time during the lifetime of their account. Where such action is taken by a Customer, the Customer Data will be deleted immediately and will no longer be subject to Time Doctor's standard data retention periods. More specifically a Customer can:

<u>Delete a user account</u> – user accounts can be deleted within your account settings; this has the effect of deleting all Customer Data associated with the

specific user. Once deleted, Time Doctor can't retrieve or recover any of the data as it's permanently deleted.

Request deletion of your account through a written instruction – you can contact Time Doctor and request deletion of your account at any time. Our contact information for these purposes is available here: https://www.timedoctor.com/contact-us. Where such action is taken by a Customer, the account and all the Customer Data will be deleted within 30 days after receiving the request by Time Doctor.

Customers should download and export any Customer Data or reports that they may want to have continued access to, prior to deletion. This may happen by manually exporting the data or using Time Doctor public API to do that programmatically.

Final Data Retrieval/Deletion (Self-service) following expiry or termination of the business relationship

Following the termination or expiry of our business relationship, we will return or delete your Customer Data. More specifically:

- If you would like us to "return" your Customer Data, we invite you to download and export your Customer Data reports using your account settings. For more information, please visit: https://support2.timedoctor.com/knowledge.
- · If you would like us to delete your Customer Data, you will need to provide us with this instruction in writing. Our contact information for these purposes is available here: https://www.timedoctor.com/contact-us.

If we do not hear from you, we will retain your Customer Data for 180 days from termination or expiry, after which it will be deleted (as a "dormant" account).

"Dormant" accounts

Accounts will be considered "dormant" where:

- <u>Paid-for-Accounts</u> a period of 180 days has elapsed after a Paid-for-Account has been locked (i.e. access removed) due to non-payment of subscription fees for 30 days..
- Freemium Accounts a period of 180 days has elapsed after a Freemium Account has been inactive for 180 days (i.e., no time tracked via the Service)..
- · Trial Accounts a period of 180 days has elapsed after the trial period has ended.

Once an account has become "dormant", Time Doctor will delete the account and the associated Customer Data.

Accessing and downloading Customer Data

We encourage our Customers to regularly assess whether they may need to retain Customer Data on their own systems following the expiry of our Customer Data retention periods (described above). In addition to purchasing a Customer Data storage subscription, Customers can download and export [reports] at any time:

· Information about retrieving and downloading reports can be found in our support knowledge base service https://support2.timedoctor.com/knowledge.

Deletion During Active Accounts

Customers can delete data anytime within their active account:

- User Deletion: Removing a user deletes their associated data.
- Account Deletion: Request account removal through a written instruction.

Deletion of Customer Data at Time Doctor

Once Time Doctor has identified Customer Data for deletion (i.e., following the expiry of a retention period, where an account is dormant, or where a Customer has indicated that Customer Data should be deleted), Time Doctor will ensure that the data is securely overwritten or destroyed such that it can no longer be viewed, processed, accessed, or reconstructed.

However, certain data that has been anonymized and no longer contains any sensitive personally identifiable information (PII) may be retained for machine learning purposes, research, and development activities. This anonymized data will be stripped of any elements that could link it back to an individual or a specific customer, ensuring that privacy is maintained while enabling Time Doctor to enhance its services and develop new features.

By anonymizing data, Time Doctor can leverage valuable insights while upholding its commitment to customer privacy and data protection.

Compliance with applicable laws

Time Doctor's retention and deletion of Customer Data shall at all times be subject to and undertaken in accordance with any applicable laws; from time to time, Time Doctor may be

required to retain Customer Data for periods that exceed those set out herein to comply with applicable laws, court orders or requests from regulatory or governmental authorities.