

Data Retention Policy

Referência: GDPR-DOC-PRDA

Versão: 1.0

Data: 01/09/2025

Classificação: Público

GDPR - Organizational Measures

1. Framework and initial considerations

In its daily operations, Moloni Unipessoal, Lda collects and retains various types of data through multiple channels and with different categorizations. The relevance and sensitivity of the different types of data collected determine their subjection to different internal and external regulations, technical and organizational measures defined by the company for their protection and preservation.

This policy encompasses all data collected and processed by the company, including personal data, data under Moloni's control, recorded in any type of medium, and operated/processed by any employee, service provider, administrator, and other human resources in the company's service.

Moloni thus has the responsibility to ensure compliance with all legal and regulatory norms and contractual conditions in the collection, retention, retrieval, and destruction of the data it processes. Special emphasis is placed on the General Data Protection Regulation (GDPR) and its requirements for the collection and processing of personal data.

Demonstrating Moloni's systematic self-regulation attitude concerning data protection matters, this policy aims to establish the management of records and documents containing personal data so that their retention aligns with business activity and legal requirements, specifically with the principles of storage limitation and processing limitation characterized by the Regulation.

The following documents are also relevant for the implementation of this policy:

- Moloni's Privacy and Data Protection Policy;
- Record of Processing Activities Map.

2. Definitions and General Principles

The Data Retention and Protection Policy establishes a set of principles that must be followed to ensure the company can demonstrate compliance with the obligations related to the processing of personal data. These principles may include, but are not limited to:

- The data must be kept in strict compliance with all applicable regulations, regulatory requirements, and contractual conditions, as well as in a lawful and transparent manner;
- The data must not be retained for longer than strictly necessary;
- Data protection may require different technical and organizational measures depending on its importance and classification;
- The data must remain usable by the company in a state of permanent availability.

3. Types of Data and roles played

In this policy, Moloni's role in various processing activities is considered either as Data Controller or Data Processor. The principles of data deletion apply to each role played.

3.1 - Moloni as Data Controller

As Data Controller, Moloni determines the purpose for which data is processed, the tools and systems used for processing, and also how long data is retained.

Personal data for which Moloni acts as Data Controller will be retained only until they are no longer necessary for the purposes for which they were collected, or, whichever comes first, **12 months after the last recorded activity** or as required by supplementary regulations, in the case of human resources.

Moloni as Data Controller

Data Category	Description	Retention Period	Justification Regulatory	Allowed Storage Medium
Identification and credentialing data for platform access	Username and password	Up to 6 months from the cancellation of contract as outlined in the Terms of Service	Fulfillment of contractual obligation - Terms of Service - and legitimate interests of the entity - Technical, historical, or statistical analyses	Digital - proprietary infrastructure
Identification data for communication actions/marketing	Email address	Up to 6 months from the cancellation of contract as outlined in the Terms of Service	Compliance with contractual obligations - Terms of Service - and legitimate interests of the entity - Technical and historical or statistical analysis	Digital - proprietary infrastructure
User browsing data	Pages visited within the platform / Actions performed	3 months after the first visit	Legitimate interest of the entity/fulfillment of contractual obligations	Digital - proprietary infrastructure
Data related to document operations	Actions available on documents: email submissions, downloads, date of changes	1 year after the operations	Legitimate interest of the entity / fulfillment of contractual obligations	Digital - proprietary infrastructure
Data related to customer profile operations	Record of changes made to customer data	1 year after the operations	Legitimate interest of the entity / fulfillment of contractual obligations	Digital - proprietary infrastructure
Data of official Moloni agents	Identification of responsible individuals for the agencies and operators authorized to receive specific information	1 year after termination as stipulated in the agency contract	Fulfillment of contractual obligation - official agent agreement	Digital - proprietary infrastructure
Visitor data from the Moloni website	Creation of analytical metrics to compare the number of website visitors with	2 months as per management platform controls	Informed consent, as per the privacy notice present on the front-end pages	Digital - analytics platform infrastructure

the obtained records
and functionality
used in the program

Human resources data	Management of employee relations - hiring, transfer, cessation, payroll processing and conditions, bonuses, professional career development, education, and professional training	Considered good, the deadlines defined in the tables of Ordinance 112/2023 of April 27 - code 250	Ordinance 112/2023 of April 27 - code 250	Digital - proprietary infrastructure
----------------------	---	---	---	--------------------------------------

3.2 - Moloni as Data Processor

As a Data Processor, Moloni operates according to rules established in Data Processing Agreements and in accordance with the Terms of Service provided to our customers at the time of product subscription.

Moloni retains data necessary for processing operations only until termination of the contract as outlined in the Terms of Service. The principle observed by Moloni is that all data necessary for processing operations will be deleted up to a maximum of 6 months after termination of the contract.

Data Category	Description	Retention Period	Regulatory justification for the retention period	Permitted Storage Medium
Data for document issuance (name, VAT number, address, city, postal code)	Issuance of tax and validation documents through the platform.	6 months from the cancellation of the contract as outlined in the Terms of Service	Fulfillment of contractual obligation - Terms of Service	Digital proprietary infrastructure -
Customer, vendor, and supplier records (name, VAT number, address, city, postal code, phone, email, alternate address, contact person)	Identification of customers, vendors, and suppliers	6 months from the cancellation of the contract as stipulated in the Terms of Service	Fulfillment of contractual obligation - Terms of Service	Digital proprietary infrastructure -

4. Retention periods and applicable regulations

The determination of retention periods is based on the effective continuation of processing activities performed by the company on the collected data, combined with the expectation of future uses that enable the continuity and deepening of established business relationships. Consideration is also given to different legal bases for retention, such as those dictated by applicable regulatory requirements, and operational needs of a commercial and technical nature that facilitate the execution and delivery of services.

It is Moloni's obligation to ensure that personal data held in physical or digital information assets are not retained for longer than strictly necessary for the purposes for which they were collected. This includes ensuring the exercise of data protection rights by data subjects, such as the right to information, which should safeguard information associated with the retention period or criteria used for the preservation of personal data.

Therefore, once the purposes for which the data were collected and processed have been fulfilled, such data should be subject to deletion and/or destruction. In this regard, it is the responsibility of service managers to apply the retention periods defined in the previous table. Regarding personal data necessary to prove compliance with contractual or other obligations, they should be retained until the legally stipulated limitation period for the exercise of corresponding rights has expired, based on a case-by-case analysis.

5. Selection of storage media

The selection of long-term storage media should consider the physical characteristics of the medium and the anticipated period of its use. As a technology-based company, Moloni selects storage media based on functional and security objectives.

When there are legal requirements regarding data retention for specific data categories, appropriate precautions should be taken for the selected media. For non-digital media (especially paper-based), copies should be maintained where possible to promptly address deterioration of the primary medium.

For data maintained on digital media, similar precautions should be taken to ensure material longevity, including proper storage conditions and the ability to migrate data to more robust media as needed. If Moloni cannot guarantee the interoperability of the media, third-party services may be used to ensure access and readability of data across different media types.

6. Data recovery

Deliberations concerning data preservation must ensure that all organizational information, especially personal data, maintains unwavering standards of integrity, availability, and security. These standards must remain undisturbed over time and must be subject to rigorous auditing.

A prudent balance should be established between the costs and risks inherent in data storage and the cataloging of the most likely circumstances in which archived data will need to be reused.

7. Data destruction

As soon as the stored data reaches the end of its useful life as defined in the table above, its destruction must occur in such a way that it can no longer be processed. The destruction procedure must have its own record that is suitable for the creation of reliable audit evidence.

8. Review of retained data

The retention and maintenance of personal data must be subject to a regular review process developed under the guidance of management to ensure that:

- The Data Retention Policy remains valid in all its terms;
- The data is being retained and maintained in accordance with the defined policy;
- The data is being securely deleted within the previously defined timeframes;
- Legal and contractual regulations are being met;
- The processes for accessing retained data comply with the previously defined purposes.