

# DATA RETENTION POLICY

Last updated: November 2025

Company: CinePath Ltd (Company No. 16817624)

Contact: legal@cinepath.co.uk

Domain: cinepath.co.uk and related subdomains

## 1. Purpose

This Data Retention Policy ("Policy") establishes how CinePath Ltd ("CinePath," "we," "our," "us") manages the retention, storage, and deletion of personal and business data collected through its operations, including Cine3D, Cine3D Pro, ConveyorPro, and CineDRAW.

The purpose of this Policy is to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 while maintaining efficient record management and customer service continuity.

## 2. Scope

This Policy applies to all personal, financial, and operational data handled by CinePath Ltd, including:

- Customer and supplier contact information.
- Quotations, invoices, and transaction records.
- Uploaded 2D and 3D digital files.
- User account details and correspondence.
- Internal operational records and logs.

It covers all CinePath systems, databases, and physical or digital backups stored in the United Kingdom.

## 3. Data Retention Periods

CinePath retains data only for as long as necessary to fulfil its operational, legal, and regulatory obligations.

Data Type	Retention Period	Purpose
Customer contact details	Retained for 7 years or until deletion requested	Communication and repeat orders
Invoices, payment records, and quotations	7 years	Accounting and tax compliance
Uploaded CAD, 2D, and 3D files	Retained for repeat orders; deleted upon request	Manufacturing reference
User accounts and login data	Active while in use; deleted 12 months after inactivity	Service access
Email and correspondence logs	Up to 3 years	Operational record-keeping
System backups	Mirror live data retention schedules	Business continuity

CinePath may extend retention where legally required or necessary for dispute resolution or fraud prevention.

## 4. Data Storage and Security

All CinePath data is securely stored on UK-based servers and encrypted cloud storage systems.

Access is limited to authorised CinePath personnel only, with permissions monitored and logged.

Technical and organisational safeguards are implemented to prevent unauthorised access, alteration, or loss

of data.

## **5. Backups and Archiving**

CinePath performs regular encrypted backups of all critical systems.

Backups are stored within the UK and retained according to the same schedules as the live systems they replicate.

Archived data is reviewed periodically to ensure relevance and secure disposal when no longer needed.

## **6. Data Deletion and Disposal**

At the end of the retention period, or upon verified deletion request, CinePath will:

- Permanently delete digital data from active and backup systems.
- Securely shred or destroy any physical records.
- Ensure third-party processors or cloud hosts comply with equivalent deletion standards.

Deletion requests must be submitted in writing to [legal@cinopath.co.uk](mailto:legal@cinopath.co.uk), subject to legal and financial retention requirements.

## **7. Data Access Control**

Access to retained data is restricted to authorised CinePath personnel based on operational need.

Access logs are maintained, reviewed, and audited to ensure compliance and accountability.

## **8. Customer Rights**

Customers have the right to request:

- Access to their personal data.
- Correction of inaccurate data.
- Deletion ("right to be forgotten") where legally permissible.

Requests will be handled in accordance with UK GDPR timeframes and obligations.

## **9. Policy Review and Compliance**

This Policy is reviewed annually by CinePath management to ensure compliance with data protection laws and operational effectiveness.

## **10. Governing Law**

This Policy is governed by the laws of England and Wales and complies with the UK GDPR and Data Protection Act 2018.

Any disputes arising under this Policy will be subject to the exclusive jurisdiction of the courts of England and Wales.