



DATA RETENTION AND DELETION POLICY

How long information is kept, and how it is deleted or made anonymous

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1. Purpose

This policy makes sure that Zebroid Private Limited keeps personal data for as long as the law and the care of patients require, and no longer. It applies to all personal data handled for Consult Your Doctor, in any form.

2. Principles

- Data is kept only for a stated purpose and for a stated period.
- Where two countries' laws set different periods, the longer period applies to records that are subject to both.
- Where no legal period applies, the shorter period in the table applies.
- Data that is no longer needed is deleted securely, or made anonymous so that no person can be identified.

3. Retention schedule

The periods below are proposed and must be confirmed by counsel in each country before the policy is approved.

Category	Proposed period	Basis
Medical records (consultations, prescriptions, reports)	At least 3 years in India, and 10 years in Germany; the longer period applies to patients treated in both	Professional record-keeping rules; German civil code on treatment records
Consent records	As long as the related data is kept, plus 3 years	Proof of consent
Follow-up messages and alerts	As for medical records, because they form part of the record	Care record
Invoices and accounting records	8 years in India; 6 to 10 years in Germany depending on the document	Company and tax law
Doctor and centre credential files	While active, plus 6 years	Legal claims; regulators
Complaints and incident reports	6 years from closure	Quality and legal claims
Access and security logs	1 year, and longer for an open investigation	Security
Marketing consents and contact details	Until withdrawn	Consent
Employee records	While employed, plus the period set by employment, tax and social security law	Employment law
Website analytics data	No more than 14 months	Privacy by design

4. Deletion

Each quarter the data protection lead runs a deletion routine for data whose period has ended and records the result. Electronic data is erased from live systems and, within 90 days, from backups. Paper is shredded. Devices are wiped before they are reused or discarded. A legal hold, ordered by the directors, stops deletion of data that is needed for a claim or an investigation.



5. Requests from individuals

A request to erase data is answered within the time the law allows. Medical records that must be kept by law are not erased on request, but they are restricted and the individual is told why.

6. Roles

The data protection lead owns this policy and the retention schedule, and runs the quarterly deletion routine. Each department head confirms every year that the records in their area are covered by the schedule. The technical lead carries out the deletion in systems and backups. The legal adviser advises on legal periods and legal holds.

7. Legal holds

Where a claim, an investigation or a request from an authority is expected or in progress, the directors may order a legal hold on specified records. While a hold is in force, the records are not deleted, even if their period has ended, and the data protection lead keeps a register of holds, which is reviewed every quarter. When the hold ends, the normal period applies from that date.

8. Backups and archives

Backups keep data for no longer than 90 days after the data has been deleted from live systems, and they are encrypted. Archives of medical records are held in a secure, separate system with restricted access, and records in the archive are subject to the same schedule.

9. Records held by third parties

Doctors, diagnostic centres, pharmacies and other partners who hold copies of data must delete or return it at the end of the period, in line with their agreements, and confirm in writing. The company may ask for evidence of deletion and may audit it.

10. Audit

Check	Frequency	Owner
Deletion routine completed and recorded	Quarterly	Data protection lead
Sample of records checked against the schedule	Twice a year	Data protection lead
Legal holds reviewed	Quarterly	Legal adviser
Schedule reviewed against law	Yearly	Legal adviser

Approval

This document is approved by the directors of Zebrold Private Limited, the operator of Consult Your Doctor.

Hemendrah Kumar Sadamsetty

Electronically signed | November 5, 2026

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Director, Zebrold Private Limited

Date: November 5, 2026

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