Axeten Personal Data Handling Policy
Transmission, Storage & Deletion

February 2024

1. Identifying the Data Controller & the Data Processor
The customer is the Data Controller. Axeten is the Data Processor.

2. Purpose of Personal Data Handling
Personal Data is handled for the sole purpose of processing an Open Source Intelligence investigation by the Data Processor at the instruction of the Data Controller. The only personal data that is received and stored by the Data Processor shall be provided within an Investigation Instruction sent by the Data Controller to the Data Processor.

3. Storage Jurisdictions of the Data Processor
All Personal data handled by the Data Processor is stored in the EU. The mail server is hosted in the Netherlands. The cloud storage server is hosted in Germany.

4. Transmission of Personal Data to the Data Processor
Personal Data is transmitted by one of two methods:-
1. by e-mail from the Data Controller to the Data Processor. The Data Controller is obliged to not include and personal data in the body of the e-mail message. The instruction shall be provided by way of an attached document. Only the instruction document shall contain Personally Identifiable Information.
Upon receipt of the instruction e-mail, the Data Processor shall detach the instruction document from the e-mail and save the Instruction document to the cloud storage server of the Data Processor.
2. The Data Processor provides a ‘Dropbox’ capability on the Cloud Storage facility of the Data Processor and where the Data Controller instructs the Data Controller with a case reference number. The Data Processor creates a dedicated folder on the Cloud Server of the Data Processor and enables a ‘ Drop Box’ capability. A link to the dedicated folder is sent by e-mail to the Data Controller and a password to the dedicated folder is sent by SMS to the Data Controller, so that the Data Controller might upload all files that contain PII to the dedicated folder on the Cloud Server of the Data Processor. The Data Controller is obliged to notify the Data Processor that the relevant files have been uploaded to the Cloud Server.

5. Collection of Personal Data

Where the Data Processor processes the instruction, more personal data shall be located, gathered and preserved by the Data Processor within the processing application of the Data Processor.

6. Primary Storage Policy of the Data Processor

During the processing activity, Personal Data shall be stored within the local database of the processing application.

When the processing activity is complete, the Personal Data that has been gathered and preserved within the Processing application shall be exported as a single Case eBundle to the cloud storage of the Data Processor. The Case eBundle shall contain all of the material and personal data relating to the processed instruction.

7. Back-up Storage Policy of the Data Processor

Each night, the Data Processor shall open a connection between the cloud storage server of the Data Processor and an 'off-line' Back-up storage server. As required by the Back-up policy of the Data Processor, the Back-up server shall request either a complete or an incremental copy of the data located on the cloud storage server. It is the Policy of the Data Processor to retain the nightly backup for a term of 3 calendar months.

8. Methods of Transmission of Personal Data to the Data Controller

When the processing activity is complete, limited personal data, that shall be a Summary of the processing activity, shall be transmitted from the Data Processor either:-

1. by way of an e-mail to the Data Controller so that all PII shall be contained in attached files and no PII shall be contained in the body of an e-mail and where all attached files are removed from the Sent folder on mail server of the Data Processor, or;
2. the preferred method where, the e-mail to the Data Controller contains a link, that is valid for seven days, to the folder on the cloud server of the Data Processor and where a password to that folder is sent by SMS to the responsible person that is employed by the Data Controller, so that the Data Controller may directly download the files that contain PII and where a Summary of the investigation process, that does not contain any PPI, shall be composed in the body of the e-mail.

9. Obligation of the Data Controller to Download Personal Data

The Data Controller shall be obliged to access the secure Cloud server of the Data

Processor and download the Case eBundle, that shall contain all of the material and personal data relating to the processed instruction, to the preferred data storage facility of the Data Controller.

10. The Data Processor Deletion Policy

When the Case eBundle shall be exported from the processing application of the Data Processor to the secure Cloud storage of the Data Processor, all personal data shall be deleted from the cache of the processing application.

The Case eBundle shall be deleted from the Cloud Server. After payment is received by the Data Processor, the Case eBundle is marked for deletion.

On the first Wednesday of the following month, all Case eBundles marked for deletion shall be deleted from the cloud storage server. At the same time, the original instruction received by the Data Processor shall be deleted from the cloud storage server.

The Data Processor believes that this Policy is reasonable and that it complies with the general condition of the Data Controller that the Data Processor shall delete all material relating to an instruction.

11. The Data Controller's Obligation to be Aware of this Policy

Up to 12 or more months after the instruction was processed and first provided to the Data Controller, some Data Controllers have requested that the Data Processor shall provide a Case eBundle. The Data Processor has not been able to comply with the request. This has led to disappointment on the part of the Data Controller and the consequent loss of any further business for the Data Processor.

To avoid any recurrence of this situation, a Data Controller shall have the right to vary the storage term either by:

a) an explicit term request in the Instruction sent to the Data Processor, or;
b) a variation of the agreement between the parties.

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