Data Management & Security

This document concerns the **new version** of the Compliance Gate Platform launched on 2024-08-19. You can find the Data Management & Security document for the old version **here**.

Security

- 1. The website that is used for purchasing and managing the subscription is hosted by a company that specializes in 'secure hosting'.
 - Security firewall (WAF)
 - Protection from malicious traffic
 - Threat detection & blocking
 - Daily backups
- 2. The Compliance Gate Platform is hosted on Bubble.io
 - Bubble is SOC 2 Type II compliant
 - Bubble is built on AWS, which supports 143 security standards and compliance certifications.
 - Server logs (14 days)
 - Version backup & restore functionality (14 days)
 - Database backup & restore functionality (14 days)

You can find more information on Bubble security on this page.

- 3. Uploaded files (limited to lab test reports), product images, and document images are hosted by Bubble as well, which stores them as private files on Amazon AWS.
- 4. We use SSL certificates (Platform and website) to protect your data.
- 5. We keep the website and Compliance Gate Platform updated. This includes the PHP version, CMS version, third-party software, and Bubble updates.
- 6. When you log in to our website, a unique and encrypted JSON Web Token (JWT) is created. The token allows you to access the Compliance Gate Platform. The token expires when you log out from the website.

Note: There is always a risk that a website or application is hacked or for other reasons experience data loss. The latter can happen in case of updates or coding errors. We strongly recommend that you always maintain backups of all files generated or uploaded to the Compliance Gate Platform. The Compliance Gate Platform should not be relied upon as a file storage system.



How to remove your product data

You can manually remove data (e.g. requirements lists, certificates, and label files) from your account in case you don't intend to renew your subscription in the future.

- 1. Login <u>here</u>
- 2. Go to Dashboard
- 3. Click on the x button in the top right corner of each product you wish to delete



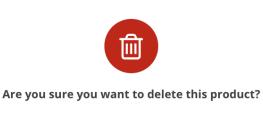




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4. Click DELETE PRODUCT



Warning! All files associated with this product will be deleted and cannot be recovered

DELETE PRODUCT

Note: You cannot delete all products in one click. This is a safety measure.



Subscription Expiry

Do you keep data after subscription expiry?

The following data is stored on your account after account expiry:

- User information
- Billing details
- Product database
- Compliance requirements lists
- Certificate files
- Label files
- Uploaded test reports
- Notes
- Tickets

Why is the data kept after account expiry?

- 1. Section 51C of the Inland Revenue Ordinance in Hong Kong S.A.R (China) requires that we retain records (user information, billing details) for accounting purposes for a minimum of 7 years.
- 2. You may want to subscribe again at some point in the future.

Can we delete data after the subscription expires?

Yes, you can still login and delete each product you have added. Doing so also deletes the files associated with each product.

Can we still access existing requirements lists, certificates, and label files after expiry?

No, you cannot access existing requirements lists, certificates, and label files without an active subscription. However, you can still login and remove products.

Will we get access if we subscribe again?

Yes, you can resubscribe to get access to your existing product files if you do so within 1 year from the expiry date. After that we reserve the right to remove all your data.

For how long do you keep our data after expiry?

We reserve the right to delete the account, including your product data (requirements lists, certificate files, label files, uploaded test reports, and notes) 1 year after the expiry date.



Terminate Account

How can I delete/terminate our account?

You need to:

- a. Login into your account and delete all your products (see above section "How to remove your product data"), and
- b. Fill in this form to request us to terminate your account: https://app.compliancegate.com/terminate-account

Note: You must specify the email address holding the main account.

We will then request confirmation via email. Once you confirm, we will perform the following actions:

- 1. Reset your password, login into your account, and confirm that all products and files are deleted
- 2. Delete your tickets
- 3. Delete your subscription
- 4. Delete your user (and subusers, if any)

Note: You must confirm via email address holding the main account.

How can we delete our account if we forgot the email/username or password?

- 1. We do not share the account email or username.
- 2. You can request a new password that will be sent to your account email.

Do you keep data after account termination?

Yes, we keep your order data, which includes information such as:

- Name
- Company name
- Address
- Email address
- Product purchased
- Amount spent
- IP address used during the purchase

Similar information is also retained in:



- a. The accounts that we hold with our payment processors (Stripe, Paypal, or Airwallex).
- b. Our accounting software
- c. Google Workspace (PDF invoice)

Why do you keep data after account termination?

<u>Section 51C</u> of the Inland Revenue Ordinance in Hong Kong S.A.R (China) requires that we retain records (user information, billing details) for accounting purposes for a minimum of 7 years.

Backups

Do you maintain backups?

Yes, we maintain website backups (including database) and Bubble backups (including database).

What data do you backup?

- 1. The website backups include information concerning:
 - Your order data
 - Your subscription data
 - Your user data
 - Your tickets data
 - Your product database (and relevant products files, and tickets)
- 2. The Compliance Gate Platform (Bubble.io) backups contain:
 - App data (e.g. design elements, workflows, data)
 - Database backup*

What data is not backed up?

- 1. User uploaded files are not backed up, which can include the following:
 - Product images
 - Document images
 - Test reports
 - Other user uploaded files
- 2. All user uploaded files can be downloaded from the Compliance Gate Platform. We recommend that all users maintain such backups in case of data loss.



^{*}Includes compliance requirements list data, document template data, and label data.

Why do you have backups?

We maintain backups as we must be able to restore our website (and its data), in the case of:

- Server failure (e.g. the server where our website is stored stops working)
- Human error (e.g. our team deletes data by mistake)
- Hacking
- Any other case that may require restoring a previous version of the website

How long do you maintain backups?

- 1. We maintain website backups for up to 12 months.
- 2. We maintain Compliance Gate Platform (Bubble.io) backups for up to 12 months.

Where do you store the backups?

On our Google Workspace company account.

Is any data maintained after you have deleted the backup?

- 1. Once a backup is deleted from Google Workspace, it is stored in the Google Workspace trash for 30 days.
- 2. According to Google, items in the trash will be deleted forever after 30 days.

Overview

Event	Maintained data	Duration
Subscription expiry	All product data, including product files, compliance requirements lists, label files, document files, uploaded files, notes Ticket data User data Subscription data Order data	12 months* *We reserve the right to delete the account, including your product data (requirements lists, certificate files, label files, and uploaded test reports) 1 year after the expiry date.
Account terminated	Order data	A minimum of 7 years
Website backup	Ticket data User data	12 months
	Subscription data	



	Order data	
Compliance Gate Platform (Bubble.io)	All product data, including product files, compliance requirements lists, label files, document files, uploaded files, notes User data Subscription data	12 months

Event timeline example

1. Subscription expiry: 2024-04-01*

*We may delete your account after 12 months

2. Account terminated: 2024-05-01 (upon client's request)

3. Amazon S3 backups: Maintained until 2024-06-01

4. Website backup: Maintained until 2025-05-01

5. Order data: Maintained at least until 2031-05-01

