

Data Retention Policy

CurrentClient

Purpose

This policy outlines the requirements and controls/procedures CurrentClient has implemented to manage the retention and deletion of data.

Roles and Responsibilities

- The COO is responsible for updating, reviewing, and maintaining this policy.
- The COO is responsible for determining the appropriate retention period for different types of data.
- The COO is responsible for maintaining records of data retention and deletion activities.
- The COO is responsible for enforcing data deletion methods.

Policy

For Customers

Customer data is retained for as long as the account is in active status. Data enters an “expired” state when the account is voluntarily closed. Expired account data will be retained for 1 year. After this period, the account and related data will be removed. Customers that wish to voluntarily close their account should download their data manually or request an export prior to closing their account.

If a customer account is involuntarily suspended, then there is a 90 day grace period during which the account will be inaccessible but can be reopened if the customer meets their payment obligations and resolves any terms of service violations.

If a customer wishes to manually backup their data in a suspended account, then they must ensure that their account is brought back to good standing so that the user interface will be available for their use. After 30 days, the suspended account will be closed and the data will enter the “expired” state. It will be permanently removed 1 year thereafter (except when required by law to retain).

Appendix A: Data Retention Schedule

CATEGORY TYPE	OWNER	
Corporate	CEO	
DATA TYPE	STORAGE LOCATION	RETENTION PERIOD
Corporate Records (board minutes, committee minutes, corporate seals, articles of incorporation, bylaws, annual reports, etc.)	Google Drive Savvi	Forever
Other	Google Drive	Forever

CATEGORY TYPE	OWNER	
HR Files	CEO	
DATA TYPE	STORAGE LOCATION	RETENTION PERIOD
Employee Personnel Records (including attendance, application forms, job/status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training records, and qualification records)	Google Drive Drata	Forever
Employment Contracts – Individual	Google Drive Savvi	Forever
Employment Records: All Non-Hired Applicants (including all applications and resumes: whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	Google Workspace Google Drive	Forever
Job Descriptions/Postings	Google Drive	Forever

CATEGORY TYPE	OWNER	
Log Data	CEO	
DATA TYPE	STORAGE LOCATION	RETENTION PERIOD
Application Logs	AWS Cloudwatch	1 week
CloudTrail Logs	AWS CloudTrail	1 year

CATEGORY TYPE		OWNER	
Customer Data			
DATA TYPE		STORAGE LOCATION	RETENTION PERIOD
Customer Data		Amazon DynamoDB	See policy for customers.

Revision History

Version	Date	Editor	Approver	Description of Changes	Format
V1	5/15/25	Andrew Clark	Andrew Clark	Initial policy.	.PDF
V1.1	7/22/25	Andrew Clark	Andrew Clark	Updates to roles and responsibilities.	.PDF