# Data Retention and Disposal Policy

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### **Purpose and Scope**

This data retention policy defines the objectives and requirements for data retention within Figured.

This policy applies to all users of information systems within Figured across all regions of operation.

This data retention policy covers the data retention schedule for customer data in production which can be accessed by authorised users in ordinary course of business on a need-to-know basis.

## **Information Retention**

The retention period of information shall be an active period as specified in the data retention schedule.

Information owners must enforce the retention, archiving and destruction of information, and communicate these periods to the Privacy Officer and Information Security and Compliance Officer in order to risk assess and relevant controls are implemented.

Figured processes and stores the below records for the provisioning of its services:

- Financial Records
- Business Records
- Employee Records
- Contracts
- Customer Data
- IT Records

#### **Information Backups/Archiving**

Backups of information is kept indefinitely in a controlled environment.

### **Information Destruction**

Destruction of physical documents is currently performed with secure shredding.

Devices are securely wiped.

#### Schedule

<u>Aa</u> Data	E Retention Period	Record Owner
<u>Backups</u>	Indefinitely	Product Team
<u>Demo Farms</u> <u>and their</u> <u>Transactional</u> <u>Data</u>	Automatically deleted 30 days after the creation of the demo file.	Customer
<u>Farms and</u> <u>their</u> <u>Transactional</u> <u>Data</u>	Retained while the user is a customer. Data is deleted 12 months after the farm is manually deleted by a user or billing lapses. Data can be deleted on request.	Customer
<u>Metrics</u>	Retained while the user is a customer	Product Team

<u>Aa</u> Data	E Retention Period	Record Owner
<u>User Account</u>	Retained while the user is a customer, Deleted upon request	Customer