



Data Retention Policy

This policy specifies the minimum time period for which important data and documents (hardcopy, online or other media) should be retained, protected and be made eligible for destruction. The policy also ensures that documents are promptly provided to authorities in the course of legal investigations or lawsuits.

Any Client Vendors are specifically excluded from any SproutLoud Data Retention policy. It is the responsibility of Clients to work with their own vendors to establish such policies.

Document Retention Schedule

The following types of data will be retained for the minimum periods of time with no obligation for SproutLoud to destroy such data unless contractually mandated.

Corporate Records

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|--|-----------|
| Article of Incorporation to apply for corporate status | Permanent |
| IRS Form 1023 (in the USA) to file for tax-exempt and/or charitable status | Permanent |
| By Laws | Permanent |
| Board policies | Permanent |
| Resolutions | Permanent |
| Board meeting minutes | Permanent |
| Sales tax exemption documents | Permanent |
| Tax or employee identification number designation | Permanent |
| Annual corporate filings | Permanent |

Financial Records

| | |
|--|-----------|
| Chart of Accounts | Permanent |
| Fiscal Policies and Procedures | Permanent |
| Audits | Permanent |
| Financial statements | Permanent |
| General Ledger | Permanent |
| Check registers/books | 7 years |
| Business expenses documents | 7 years |
| Bank deposit slips | 3 years |
| Cancelled checks | 7 years |
| Invoices | 7 years |
| Investment records (deposits, earnings, withdrawals) | 7 years |
| Property/asset inventories | 7 years |

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| Petty cash receipts/documents | 3 years |
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| Credit card receipts | 3 years |
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Tax Records

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|--|-----------|
| Annual tax filing for the organization (IRS Form 990 in the USA) | Permanent |
| Payroll registers | Permanent |
| Filings of fees paid to professionals (IRS Form 1099 in the USA) | 7 years |
| Payroll tax withholdings | 7 years |
| Earnings records | 7 years |
| Payroll tax returns | 7 years |
| W-2 statements | 7 years |

Personnel Records

| | |
|---|---------------------------|
| Employee offer letters | 7 years after termination |
| Confirmation of employment letters | 7 years after termination |
| Benefits descriptions per employee | Permanent |
| Pension records | Permanent |
| Employee applications and resumes | 7 years after termination |
| Promotions, demotions, letter of reprimand, termination | 7 years after termination |
| Job descriptions, performance goals | 7 years after termination |
| Workers' Compensation records | 5 years |
| Salary ranges per job description | 5 years |
| I-9 Forms | 5 years after termination |
| Time reports | 3 years after termination |

Insurance Records

| | |
|---|-----------|
| Property Insurance policy | Permanent |
| Directors and Officers Insurance policy | Permanent |
| Workers' Compensation Insurance policy | Permanent |
| General Liability Insurance policy | Permanent |
| Insurance claims applications | Permanent |
| Insurance disbursements / denials | Permanent |

Contracts

| | |
|-------------------------|-----------|
| All insurance contracts | Permanent |
| Employee contracts | Permanent |



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|---------------------------|-----------|
| Construction contracts | Permanent |
| Legal correspondence | Permanent |
| Loan / mortgage contracts | Permanent |
| Leases / deeds | Permanent |
| Vendor contracts | 7 years |
| Warranties | 7 years |

SAAS Application Data

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|---|--|
| Order Related Data | 7 years |
| Call Tracking Recordings | 1 year or as specified in writing between Client and SproutLoud; otherwise 90 days after account deactivation |
| Account Information | As long as active or 90 days after Master Account deactivation; Necessary account billing information preserved for IRS for 7 year |
| User Contacts Provided by Master Accounts | 7 years or as deleted by customer; 90 days after Master Account deactivation |
| User Contacts Provided by Sub-Accounts | 7 years or as deleted by customer; 90 days after Sub-Account deactivation |
| Fulfilled print files in PDF form | 7 years |
| Templates and Creative Files | As long as Master Account is active; Deleted at request of customer or 90-days after account deactivation |
| Account Enrollment Web Properties (MWP) | As long as enrollment is active; Deleted 90 days after deactivation |
| Server Logs | 1 year |
| Client Reporting and Analytics Data | Retained per stated lookback period of supported of report / |

| | |
|----------------------------------|---|
| | dashboard OR as long as Master Account is active; Deleted 90 days after account deactivation |
| SproutLoud Engine Analytics Data | 7 years. Sproutloud reserves the right to anonymize data and retain indefinitely for product analysis purposes. |
| FTP/SFTP Data | 90 days after creation. |

Sub-Marketing Services Vendors

This relates to any data that is passed by SproutLoud to a Sub-Marketing Services Vendor for the purposes of providing marketing services to Client and/or Sub-Accounts.

All Sub-Marketing Vendors shall have a retention policy on any Sub-Marketing Services data for a period of no longer than one-hundred twenty (120) days after the Sub-Marketing Service has ended. In the event of an on-going Sub-Marketing Service where any data collected and retained is used to enhance said Sub-Marketing Service, then Sub-Marketing Vendor shall delete all data one-hundred and twenty (120) days after termination of the relevant Sub-Marketing Service provided through the Engine.

Management Plans and Procedures

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| Strategic Plans | 7 years |
| Staffing, programs, marketing, finance, fundraising and evaluation plans | 7 years |
| Vendor contacts | 7 years |
| Disaster Recovery Plan | 7 years |

Email and Other Computer-Based Correspondence

This is in regard to correspondence/information that is developed and maintained by employees without deletion on the company's computers, whether it is in regard to work or personal information.

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|---------------------------------------|---------|
| Employee correspondence, e.g., emails | 7 years |
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Document Protection

Documents (hardcopy, online or other media) will be stored in a protected environment for the duration of the Document Retention Schedule. Computer backup media will be included. All digital data on disk at rest and transfer will be encrypted.

Document Destruction

Hard copies of documents will be destroyed by shredding or fire after they have been retained until



the end of the Document Retention Schedule. Copies of computer backups will be destroyed by proven means to destroy such media after they have been retained until the end of the Document Retention Schedule. Enterprise backups will cycle out deleted data based on backup schedules. All backups will be encrypted and behind MFA.

Provision of Documentation for Investigations or Litigation

Documents requested and subpoenaed by legally authorized personnel will be provided within 5 business days. The Board Chair and CEO will authorize provision. No documents will be concealed, altered or destroyed with the intent to obstruct the investigation or litigation.

Revision History

| Date of Change | Responsible | Summary of Change | Version ID |
|----------------|-----------------|---|------------|
| 11/2018 | Anjan Upadhya | Initial Release | 1.0 |
| 11/2019 | Anjan Upadhya | Call Tracking retention changed to 1 year or 90 days after deactivation. | 1.1 |
| 01/2020 | Anjan Upadhya | Clarifying analytics / reporting. | 1.2 |
| 09/15/2020 | Anjan Upadhya | Added FTP/SFTP data retention period of 90 days., Client Vendor data management verbiage change. Sub-Marketing Services Vendors verbiage added. | 1.3 |
| 4/2022 | Anjan Upadhya | Updated backup language | 1.3 |
| 4/2023 | Gustavo Malpica | No Changes | 1.3 |
| 3/2024 | Gustavo Malpica | No Changes | 1.3 |