



Policy Document

Policy Title: Customer Data Retention and Destruction Policy

Process Owner:	IT	Formalized Date:	July 20, 2018
Location:	Irvine, CA	Revised Date:	
Approved by:	Head of IT	Reviewed Date:	July 20, 2018

Customer Data Retention and Destruction Policy

Purpose

The purpose of this policy is to more formally articulate our retention and destruction policy for customer order data.

Description

Our essential business model is to securely, reliably and promptly retrieve information from trusted third party sources on behalf of our customers. We do not reuse our customer data for other purposes and primarily retain information to offer a convenient reference for our customers, and to satisfy certain audit requirements from trusted third party sources (e.g., IRS, SSA).

Product	Customer Data/File	Retention Period
4506-T Tax Transcript Income Verification	4506-T Forms – Wet Signed	120 days
	All NPI data, tax transcripts and e-signed 4506T Forms.	2 years
Verification of Income / Employment (VOI/VOE)	All NPI data and attachments	2 years
SSN / EIN Verification Products	SSA sourced data and SSA-89 forms	5 years
	All other SSN data	90 days
Verification of Assets (VOA) Reports	All NPI data	2 years

Our automated purge jobs generally execute within a week of the retention period with appropriate logging for confirmation. These jobs sweep through all NPI and scrub the in scope data by applying a write zero, comparable method, or via a complete delete of that data element.