



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

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

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

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



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

SAAS Application Data

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

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.

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