

DATA RETENTION POLICY

NCKO seeks to ensure that it retains only data necessary to effectively conduct its program activities and work in fulfillment of its mission.

The need to retain data varies widely with the type of data and the purpose for which it was collected. NCKO strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required. This policy sets forth NCKO's guidelines on data retention and is to be consistently applied throughout the organization.

Scope

This policy covers all data collected by NCKO and stored on NCKO owned or leased systems and media, regardless of location. It applies to both data collected and held electronically (including photographs, video and audio recordings) and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by federal or local law, federal regulations and legitimate business purposes.

Reasons for Data Retention

NCKO retains only that data that is necessary to effectively conduct its program activities, fulfill its mission and comply with applicable laws and regulations.

Reasons for data retention include:

- Compliance with applicable laws and regulations associated with financial and programmatic reporting by NCKO.
- Other regulatory requirements
- Security incident or other investigation
- Intellectual property preservation
- Litigation

Data Duplication

NCKO seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other business reasons it is necessary for data to be held in more than one place. This policy applies to all data in NCKO's possession, including duplicate copies of data.

Retention Requirements

NCKO has set the following guidelines for retaining all personal data as defined in the organization's data privacy policy.

- Financial contribution data will be retained for the year in which the individual has contributed and then for 3 years after the date of the last contribution. Financial information will not be retained longer than is necessary.
- Event participant data will be retained for the period of the event, including any follow up activities, such as the distribution of reports.
- Program participant data (including sign in sheets) will be retained for the duration of the program plus any additional time required under the terms of the data privacy agreement.
- Personal data of members and their kin will be kept for the duration of the membership.
- Consultant (both paid and pro bono) data will be held for the duration of the consulting contract plus 1 year after the end of the consultancy.
- Data associated with payments (including benevolent payments) will be held for 3 years.
- Operational data related to program proposals, reporting and program management will be held for the period required by the NCKO data privacy agreement.

Data Destruction

Data destruction ensures that NCKO manages the data it controls and processes it in an efficient and responsible manner. When the retention period for the data as outlined above expires, NCKO will actively destroy the data covered by this policy. If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, he or she should identify this data to the officials and provide information as to why the data should not be destroyed. Any exceptions to this data retention policy must be approved by NCKO's data protection officer in consultation with legal counsel. In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.