

<b>Title:</b> Modern Hire Client Data Retention Policy	
<b>Department:</b> Information Security	<b>Contact:</b> Jamie Macko
<b>Approval Date:</b> 11/2022	<b>Last Review Date:</b> 11/2022 <b>Review Period:</b> Annual
<b>Applicability:</b> All employees, contractors, and vendors of Modern Hire and its affiliated entities who access or use Modern Hire technology or who process or store Modern Hire data, irrespective of location.	
<b>Authority:</b> The Executive Leadership Team subordinates and supports the policies defined within the Corporate Information Security Policy. It is enforceable as an extension of the Corporate Information Security Policy, under the direction of Modern Hire’s Board of Directors.	

## Table of Contents

- 1. Overview ..... 2
- 2. Purpose ..... 2
- 3. Scope ..... 2
- 4. Policy ..... 2
  - 4.1. Client Agreements ..... 2
  - 4.2. Retention Period Configuration ..... 2
  - 4.3. Determining Purge Date ..... 3
  - 4.4. Data Retention Audit Logging ..... 4
  - 4.5. Legal Holds..... 4
    - 4.5.1. Options for Legal Hold ..... 4
    - 4.5.2. Legal Hold Reporting ..... 4
    - 4.5.3. Removal from Legal Hold ..... 4
    - 4.5.4. Compliance and Record Keeping ..... 5
    - 4.5.5. Client Communication..... 5
- 5. Enforcement ..... 5
- 6. Key Roles & Responsibilities ..... 5
- 7. Reference Material ..... 6
- Exception(s):..... 6
- Revision History: ..... 6