Data Retention and Disposal Policy

Augustine Realty Company

Document	Data Retention and Disposal Policy
Version	1.0
Effective date	2 August 2026
Owner	Austin Riley Clough, CEO (acting Security Officer) — augustinerealtycompany@gmail.com
Review cycle	Annually
Parent document	Information Security Policy v1.0

---

1. Purpose and scope

This policy defines how long Augustine Realty Company keeps each category of data, on what legal or business basis, and how that data is destroyed when the period ends. It applies to Augustine Portal, Augustine Net Worth, the production database, backups, email, and any export taken from those systems.

The principle is minimisation: data is kept because a law or a stated business need requires it, not because keeping it is easier than deleting it.

2. Retention schedule

Data	Retention period	Basis
Plaid access tokens	Deleted immediately on revocation of the connection, on account closure, or when the integration is retired	No basis to hold a live credential once the connection ends
Bank account balances and transaction history retrieved via Plaid	7 years from the transaction date	IRS record-retention guidance for business income, expense and asset records; lender and audit requests
Asset, valuation and loan records	7 years after disposal of the asset or discharge of the loan	Tax basis and capital-gains substantiation
Net-worth snapshots	7 years	Historic reporting; superseded snapshots are never recomputed
User accounts (name, email, role, password hash)	Duration of the relationship, then deleted within 30 days of closure or of a deletion request	No basis to retain after access ends
Rental applications that were not approved	3 years from the decision	Fair-housing recordkeeping

Lease, tenancy and rent-payment records	7 years after tenancy ends	North Carolina tax and landlord-tenant recordkeeping
Maintenance requests and attached photographs	4 years after completion	Habitability and liability claim window
Email verification and password-reset tokens	Expire on use or within 24 hours, then purged	Single-purpose credential
Application audit log	7 years	Append-only; the record of who changed what, needed precisely when something is disputed
Platform request and error logs	Per the hosting provider's retention (currently 30 days or less)	Operational troubleshooting and incident investigation
Database backups	30 days of point-in-time recovery	Recovery objective (RPO/RTO 24 hours) with margin
Marketing and waiting-list contacts	Until the person unsubscribes, then removed within 30 days	Consent-based

Where a category is subject to a **legal hold** — litigation, an audit, or a regulatory request — deletion is suspended for that data until the hold is lifted in writing by the Owner.

3. Deletion requests

A person may ask to see, correct, or delete what we hold about them by emailing augustinerealtycompany@gmail.com. We respond within **30 days**. Where a record must be retained under §2 for a legal or tax reason, we say so, say which reason, and delete everything not covered by it.

Revoking a bank connection in Augustine Net Worth ("Forget") deletes the stored access token immediately. Balances and transaction history already retrieved are retained under the schedule above unless deletion is separately requested.

4. Disposal method

- **Database records** are deleted with a hard `DELETE`, not a soft-delete flag. A row marked "deleted" that still holds the data has not been disposed of.
- **Encrypted material** (bank access tokens) is deleted from the row; where a key is retired, the key is destroyed in the secret store, which renders any residual ciphertext unrecoverable.
- **Backups** are not edited. Deleted data persists in point-in-time backups until those backups age out under §2 (30 days), after which it is unrecoverable. Deletion requests are recorded so that a restore does not silently reinstate deleted data — any restore is followed by re-applying deletions logged since.
- **Files and exports** are deleted from the storage bucket or workstation and removed from any local recycle bin or trash.
- **Physical media and retired devices** are wiped with full-disk erasure or physically destroyed before disposal. Devices holding Restricted data are encrypted for their whole life, so a failed drive that cannot be wiped is destroyed rather than returned.
- **Paper**, where any exists, is cross-cut shredded.

5. Enforcement and review

The Owner verifies at each **quarterly access review** that expired data has in fact been removed and that no revoked connection still holds a token. This policy is reviewed at least annually and whenever retention law relevant to the business changes.

Approved by

Austin Riley Clough — CEO, Augustine Realty Company

Signature: ______________________ Date: ______________