

# Fox ML Infrastructure — Data Retention & Deletion Policy

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This document defines how long Fox ML Infrastructure retains information and how clients can request deletion.

This policy is essential for enterprise compliance and data governance requirements.

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## 1. Executive Summary

**Fox ML Infrastructure does not store or process client data from software usage.**

However, we do retain limited information for: - **Licensing management** — Commercial license records and communications - **Support services** — Support communications and issue history - **Consulting engagements** — Project-related information (deleted upon completion)

**This policy explains retention periods and deletion procedures.**

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## 2. Data Retention Principles

### 2.1 General Principles

Our retention principles:

- **Minimal retention** — Retain only information necessary for business operations
- **Purpose-limited** — Retain information only for the purpose for which it was collected
- **Legal compliance** — Retain information as required by law or legal obligations
- **Client-controlled** — For consulting engagements, data retention is client-controlled

### 2.2 No Client Data Storage

**Important:** Since our software is client-hosted:

- **No software data storage** — We do not store any data from software usage
- **No production data** — We do not have access to client production data
- **No trading data** — We do not store trading signals, positions, or financial data
- **No model data** — We do not store model outputs, predictions, or results

**Clients are responsible for their own data retention and deletion policies.**

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### 3. Retention Periods by Data Type

#### 3.1 Licensing Information

##### Commercial License Records:

- **Retention period:** Duration of commercial relationship + 7 years (for tax and legal compliance)
- **Includes:** License agreements, payment records, correspondence, audit records
- **Purpose:** License management, compliance, dispute resolution
- **Deletion:** Deleted 7 years after relationship termination (unless required by law)

#### 3.2 Support Communications

##### Support Emails and Communications:

- **Retention period:** 3 years from last communication
- **Includes:** Support emails, issue descriptions, resolution notes, configuration details (if provided)
- **Purpose:** Support history, issue tracking, quality improvement
- **Deletion:** Deleted 3 years after last communication (unless required by law)

#### 3.3 Website Logs (If Applicable)

##### Web Server Logs:

- **Retention period:** 90 days
- **Includes:** IP addresses, access times, browser types (standard web server logs)
- **Purpose:** Website operation, security monitoring
- **Deletion:** Automatically deleted after 90 days

#### 3.4 Consulting Engagement Data

##### Consulting Project Data:

- **Retention period:** Deleted upon project completion (unless written authorization provided)
- **Includes:** Client data, datasets, credentials, project artifacts, deliverables
- **Purpose:** Project execution only
- **Deletion:** All data deleted upon delivery unless client provides written authorization for retention

See `LEGAL/consulting/SECURITY_AND_ACCESS_POLICY.md` for detailed consulting data handling.

#### 3.5 Email Communications

##### General Email Communications:

- **Retention period:** 3 years from last communication
- **Includes:** Licensing inquiries, general correspondence, business communications
- **Purpose:** Business operations, relationship management
- **Deletion:** Deleted 3 years after last communication (unless required by law)

## 4. Legal and Regulatory Retention Requirements

### 4.1 Required Retention

We may retain information longer if required by:

- **Tax laws** — Tax records retained for 7 years (standard requirement)
- **Legal obligations** — Information retained as required by law or legal proceedings
- **Contractual obligations** — Information retained per contractual requirements
- **Regulatory requirements** — Information retained per regulatory requirements

### 4.2 Exception Handling

If legal requirements conflict with deletion requests:

- **Legal compliance** — We will retain information as required by law
  - **Notification** — We will notify you if legal requirements prevent deletion
  - **Minimal retention** — We will retain only the minimum information required by law
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## 5. Deletion Procedures

### 5.1 Automatic Deletion

Information is automatically deleted:

- **Website logs** — Automatically deleted after 90 days
- **Expired retention periods** — Information deleted after retention period expires
- **Consulting data** — Automatically deleted upon project completion (unless authorized)

### 5.2 Request-Based Deletion

You may request deletion of your information:

- **Email request** — Send deletion request to [jenn.lewis5789@gmail.com](mailto:jenn.lewis5789@gmail.com)
- **Subject line** — “Data Deletion Request — [Your Organization Name]”
- **Required information:**
  - Your name and organization
  - Email address associated with the account
  - Specific information you want deleted (if applicable)
  - Reason for deletion request (optional)

### 5.3 Deletion Process

Upon receiving a deletion request:

1. **Verification** — We verify your identity and authorization
2. **Review** — We review the request and identify information to be deleted
3. **Legal check** — We check if legal requirements prevent deletion
4. **Deletion** — We delete information (subject to legal requirements)
5. **Confirmation** — We confirm deletion within 30 days

**Response time:** We will respond to deletion requests within 30 days.

## 5.4 Partial Deletion

**If we cannot delete all requested information:**

- **Explanation** — We will explain why certain information cannot be deleted
  - **Partial deletion** — We will delete all information that can be deleted
  - **Legal basis** — We will explain the legal basis for retention (if applicable)
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## 6. Data Deletion Methods

### 6.1 Secure Deletion

**We use secure deletion methods:**

- **Permanent deletion** — Information is permanently deleted, not just marked for deletion
- **Secure erasure** — We use secure erasure methods for electronic data
- **Physical destruction** — Physical records are securely destroyed (if applicable)
- **No recovery** — Deleted information cannot be recovered

### 6.2 Backup Deletion

**We delete information from:**

- **Active systems** — Information deleted from active systems immediately
- **Backup systems** — Information deleted from backups during next backup cycle
- **Archives** — Information deleted from archives (if applicable)

**Note:** Backup deletion may take up to 90 days depending on backup retention policies.

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## 7. Special Cases

### 7.1 Active Commercial Relationships

**For active commercial licensees:**

- **Ongoing retention** — Information is retained for the duration of the relationship
- **Deletion requests** — Deletion requests may be limited during active relationships
- **Relationship termination** — Information deleted per standard retention periods after termination

### 7.2 Legal Holds

**If information is subject to a legal hold:**

- **Retention required** — Information must be retained during legal proceedings
- **Notification** — We will notify you if a legal hold prevents deletion
- **Release** — Information deleted after legal hold is released

## 7.3 Consulting Project Data

For consulting engagements:

- **Immediate deletion** — Client data deleted upon project completion
  - **Written authorization** — Data retained only with written client authorization
  - **Scope** — Authorization specifies what data is retained and for how long
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## 8. Client Responsibilities

### 8.1 Client Data Management

Clients are responsible for:

- **Their own data** — Managing retention and deletion of their own data
- **Infrastructure** — Securing and managing their own infrastructure
- **Compliance** — Complying with their own data retention and deletion requirements
- **Backups** — Managing their own backup and deletion policies

### 8.2 Client Data Requests

Clients may request:

- **Deletion of consulting data** — Request deletion of consulting project data
  - **Deletion of support records** — Request deletion of support communications (subject to retention requirements)
  - **Information about retention** — Request information about what information we retain
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## 9. Audit and Compliance

### 9.1 Retention Audits

We conduct periodic audits:

- **Retention compliance** — Verify compliance with retention periods
- **Deletion compliance** — Verify compliance with deletion procedures
- **Policy updates** — Update retention periods as needed

### 9.2 Compliance Reporting

We can provide:

- **Retention reports** — Reports on what information we retain and for how long
  - **Deletion confirmations** — Confirmations of deletion requests
  - **Compliance documentation** — Documentation of retention and deletion practices
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## 10. Changes to This Policy

### 10.1 Policy Updates

This policy may be updated:

- **Notification** — Commercial licensees will be notified of material changes
- **Effective date** — Updates become effective on the date specified
- **Retroactive application** — Updates apply to information collected after the effective date

### 10.2 Version History

**Current version:** 1.0 (January 2026)

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## 11. Contact

**For data retention or deletion requests:**

**Jennifer Lewis**

Fox ML Infrastructure LLC

Email: [jenn.lewis5789@gmail.com](mailto:jenn.lewis5789@gmail.com)

Subject: *Data Retention/Deletion Request — Fox ML Infrastructure*

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## 12. Related Documents

- `LEGAL/PRIVACY_POLICY.md` — Privacy Policy (data collection and use)
  - `LEGAL/DATA_PROCESSING_ADDENDUM.md` — Data Processing Addendum (zero data processing)
  - `LEGAL/consulting/SECURITY_AND_ACCESS_POLICY.md` — Security and access policy for consulting
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## 13. Summary

**Key Retention & Deletion Principles:**

1. **No software data storage** — We do not store data from software usage
2. **Limited retention** — Retain only information necessary for business operations
3. **Clear retention periods** — Defined retention periods for each data type
4. **Secure deletion** — Permanent, secure deletion methods
5. **Client requests** — Clients can request deletion of their information
6. **Legal compliance** — Retention and deletion comply with legal requirements

**This policy ensures compliance with data retention and deletion requirements.**