

Fox ML Infrastructure — Data Retention & Deletion Policy

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.

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.

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.

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/internal/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)
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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
- **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.

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)

11. Contact

For data retention or deletion requests:

Jennifer Lewis

Fox ML Infrastructure LLC

Email: jenn.lewis5789@gmail.com

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

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/internal/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.