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

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

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

3.5 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

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.

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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

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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 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**
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)

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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.