

Data Retention Policy

Last Revised: July 10, 2026

1. Purpose

This Data Retention Policy establishes how Huronia Systems Ltd. ("Huron Systems", "we", "us", or "our") retains, reviews, archives, deactivates, anonymizes, and deletes business records and personal information.

The purpose of this Policy is to ensure that information is retained only for as long as reasonably necessary for operational, contractual, legal, accounting, security, and business purposes.

2. Scope

This Policy applies to records maintained by Huronia Systems in electronic or physical form, including:

- Client account information;
- Project records;
- Contracts and signed documents;
- Electronic signature records;
- Invoices and financial records;
- Email and SMS communications;
- Support requests;
- Security and access logs;
- Identity verification records;
- Website inquiries;
- Uploaded files;
- Hosting and infrastructure records;
- Backups; and
- Internal administrative records.

This Policy applies to information stored within Huronia Systems systems and information maintained by approved service providers on our behalf.

3. General Retention Principles

Huronian Systems retains information according to the following principles:

- Information is retained only where there is a legitimate business, contractual, legal, accounting, security, or operational reason.
- Retention periods reflect the nature and sensitivity of the information.
- Information is not retained indefinitely solely because storage is available.
- Records subject to an active dispute, investigation, legal hold, or enforcement matter may be retained beyond the usual period.
- Information may be archived, restricted, deactivated, anonymized, or deleted depending on the applicable requirement.
- Backup copies may remain temporarily after deletion from active systems until overwritten through the normal backup rotation process.

4. Client Accounts

Client accounts may remain active while the Client continues to use the Client Portal or related Services.

Client account information may include:

- Name;
- Business information;
- Contact details;
- Account status;
- Login history;
- Authentication records;
- Password reset activity;
- Email verification status;
- Security events; and
- Portal activity.

Where a Client requests account deletion, the account may be deactivated rather than fully deleted where records must be retained for legal, contractual, tax, accounting, fraud prevention, dispute resolution, security, or enforcement purposes.

Inactive accounts may be reviewed periodically and may be deactivated where continued access is no longer reasonably necessary.

5. Prospective Client and Inquiry Records

Records relating to prospective Clients and general inquiries may include:

- Contact form submissions;
- Email correspondence;
- Telephone notes;
- Business information;
- Project requirements;
- Quotations; and
- Follow-up communications.

These records may be retained for up to two (2) years after the last meaningful interaction unless:

- The person becomes a Client;
- A longer period is reasonably necessary for legal or business purposes;
- The person requests earlier deletion; or
- The information forms part of an active dispute or investigation.

6. Project Records

Project records may include:

- Requirements;
- Specifications;
- Design assets;
- Technical documentation;
- Communications;
- Approvals;
- Change requests;
- Test results;
- Deployment records;
- Project files;
- Support history; and
- Deliverables.

Project records may be retained throughout the Client relationship and for up to seven (7) years after the completion, termination, or abandonment of the applicable project.

Certain technical materials, reusable components, internal tools, source control history,

development records, and operational documentation may be retained longer where they remain part of Huronia Systems' intellectual property or are reasonably necessary to support continuing Services.

7. Contracts and Signed Documents

Contracts, Project Agreements, amendments, approvals, cancellation records, authorization forms, and other signed documents may be retained for at least seven (7) years after the agreement ends or the related obligations are completed.

Records may be retained longer where reasonably necessary to:

- Enforce contractual rights;
- Defend legal claims;
- Resolve disputes;
- Confirm ownership;
- Support insurance matters;
- Demonstrate authorization; or
- Comply with legal obligations.

8. Electronic Signature Records

Electronic signature records may include:

- The signed document;
- The exact date and time of signing;
- IP address;
- Source device information;
- Authentication information;
- Account information; and
- Associated audit records.

Electronic signature records may be retained for at least seven (7) years after the applicable agreement ends or the related transaction is completed.

These records may be retained longer where reasonably necessary to verify authenticity, resolve disputes, enforce agreements, or comply with legal obligations.

9. Financial and Accounting Records

Financial and accounting records may include:

- Invoices;
- Payment records;
- E-Transfer references;
- Billing history;
- Expense records;
- Tax records;
- Credits;
- Refund records;
- Outstanding balances; and
- Collection records.

These records will generally be retained for at least seven (7) years after the end of the relevant financial year or longer where required by applicable law.

Financial records will not be deleted solely because a Client requests deletion where continued retention is required for accounting, tax, audit, legal, fraud prevention, or enforcement purposes.

10. Communications

Email, SMS, telephone notes, support communications, and project discussions may be retained for as long as reasonably necessary to:

- Provide Services;
- Maintain project history;
- Confirm instructions;
- Resolve disputes;
- Support invoicing;
- Protect legal rights;
- Investigate security concerns; or
- Meet legal obligations.

Project-related communications may be retained with the associated project records.

General communications that are no longer required may be deleted during routine record review.

Telephone recordings will be retained only where recording was disclosed and consent was obtained. Recordings will be retained only for as long as reasonably necessary for the purpose for which they were made.

11. Support Tickets

Support tickets may include:

- Technical issues;
- User requests;
- Troubleshooting records;
- Account changes;
- Security concerns;
- Service history; and
- Resolution notes.

Support records may be retained for up to seven (7) years after closure where they relate to an ongoing Client relationship, contractual obligation, recurring issue, security event, or dispute.

Routine low-risk support records may be deleted earlier where they are no longer operationally or legally necessary.

12. Security and Access Logs

Security and access records may include:

- Login timestamps;
- IP addresses;
- Failed login attempts;
- Authentication events;
- Password reset activity;
- Account changes;
- Security alerts;
- Firewall logs;
- Infrastructure logs; and
- Audit records.

Routine security logs may be retained for up to two (2) years.

Logs associated with suspected fraud, unauthorized access, abuse, legal claims, or security incidents may be retained for up to seven (7) years after the matter is resolved, or longer where reasonably necessary.

13. Identity Verification Records

Government-issued identification or other identity verification records may be collected only where reasonably necessary for identity verification, fraud prevention, contractual verification, or legal compliance.

Where practical, Huronia Systems will record that verification was completed without retaining a full copy of the identification document.

Where a copy must be retained, it will be stored with restricted access and deleted when it is no longer reasonably necessary for the verification purpose, unless continued retention is required for legal, contractual, fraud prevention, or dispute resolution purposes.

Identity documents should not normally be retained longer than two (2) years after the related project or verification purpose ends unless a longer period is justified.

14. Uploaded Files

Files uploaded through the Client Portal, support systems, or other Services may be retained:

- While the related account or project remains active;
- During the applicable support or maintenance period;
- For the period required to complete the requested Service; or
- For a longer period where necessary for contractual, legal, accounting, security, or dispute purposes.

Huron Systems may delete uploaded files after the related Service ends, the account is deactivated, or the files are no longer reasonably necessary.

Clients are responsible for maintaining their own copies of files they are entitled to retain.

15. Hosting and Infrastructure Records

Hosting and infrastructure records may include:

- Configuration records;
- Deployment records;
- Service status;
- Usage information;
- Backup status;
- DNS records;
- Monitoring data;
- Server logs; and
- Incident records.

These records may be retained for the duration of the Service and for up to seven (7) years afterward where necessary for support, billing, security, contractual, or legal purposes.

Temporary operational data may be deleted sooner where it is no longer required.

16. Backups

Huronia Systems maintains encrypted backups on a rotating basis.

Backups are retained according to available storage capacity and are overwritten by newer backups as part of the normal rotation process.

Because backups are designed for system recovery rather than individual record management:

- Deleted information may remain temporarily within backup archives;
- Individual records may not be immediately removable from historical backups;
- Backup data will not be restored solely to recover information requested for deletion; and
- Information within backups will age out through the normal overwrite cycle.

Backup archives will be protected using reasonable access controls and security safeguards.

17. Legal Holds and Disputes

Information that would otherwise be deleted may be retained where Huronia Systems reasonably believes it is relevant to:

- Pending or threatened litigation;
- A contractual dispute;
- A regulatory inquiry;
- A tax or accounting review;
- Fraud prevention;
- A security investigation;
- An insurance matter;
- Collection activity; or
- Another legal or enforcement purpose.

Deletion will be suspended until the matter is resolved and the information is no longer reasonably required.

18. Deletion and Disposal

When information reaches the end of its retention period and no longer needs to be retained, Huronia Systems will take reasonable steps to:

- Delete it from active systems;
- Remove access;
- Deactivate the related account;
- Anonymize the information;
- Securely destroy physical records; or
- Allow the information to expire through normal backup rotation.

The disposal method will reflect the sensitivity and format of the information.

19. Exceptions

Retention periods in this Policy are general standards.

Huronia Systems may retain information for a shorter or longer period where reasonably necessary because of:

- Applicable law;
- A Project Agreement;
- A service-specific requirement;
- A dispute;
- A security incident;
- An investigation;
- Technical limitations;
- Insurance requirements;
- Tax or accounting obligations; or
- Another legitimate business need.

Any exception should be limited to the information and period reasonably necessary for the applicable purpose.

20. Responsibility and Review

The Privacy Officer is responsible for overseeing this Policy and coordinating periodic retention reviews.

Huron Systems will review its record holdings periodically and take reasonable steps to identify information that should be archived, anonymized, deactivated, or deleted.

This Policy may be updated as business practices, systems, legal obligations, or Services change.

21. Contact Information

Questions regarding this Policy may be directed to:

Privacy Officer
Huron Systems Ltd.

5 Art Ann Crescent
Tiny, Ontario L0L 2J0
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Email: info@huroniasystems.ca
Telephone: (705) 321-1035