

## Data Retention Policy

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### ***Purpose***

The purpose of this policy is to protect customer privacy by establishing rules governing data retention for NOCTI and Nocti Business Solutions (NBS).

### ***Policy***

NOCTI/NBS holds and maintains customer data for the purpose of providing assessment results. NOCTI/NBS will retain individually identifiable score-related data for up to ten years. NOCTI/NBS will anonymize data and retain score-related data necessary for normative calculation purposes, according to the following schedule:

- For secondary and post-secondary data, anonymization after ten years.
- For business and industry data, anonymization after 20 years.
- For teacher data, anonymization after 20 years.

The data will be in a format that will prevent it from being de-anonymized and remove any possibility of re-identifying the individual.

At any time, NOCTI/NBS will, upon written request from customer, remove customer data by anonymizing it in a manner that makes it impossible to de-anonymize and re-identify the individual.

### ***Scope***

This policy applies to all customer data obtained and retained in the process of doing business. The Information Technology division will be responsible for the implementation of this policy.