

Out For Undergrad Data and Document Retention Policy

Purpose: The purpose of this Data Retention Policy is to ensure the safekeeping of Personal Identifying Information (PII), as defined on the [U.S. Department of Labor website](#), and outline the retention of documents held by Out For Undergrad (O4U) and to support compliance with applicable laws and regulations, while facilitating necessary access for organizational operations.

Scope: This policy applies to all employees and volunteers of O4U who have access to PII and documents in the course of their duties.

Data Access Control: O4U will implement user group roles to restrict access to PII during the retention period. Access will be granted only to employees and volunteers who require it for legitimate organizational purposes.

Role Revocation: User group roles in Hubspot will be revoked within 5 business days in the following circumstances:

- The end of an employee's or volunteer's term with O4U
- Termination of employment or volunteer service
- Transfer or change in role where access to PII is no longer necessary for an individual's role

Data Purging: PII held by O4U will be purged after a retention period of 7 years, unless the PII data retention is required for ongoing business purposes as determined by authorized personnel, such as alumni engagement and ongoing sponsorship efforts. Individuals may request that their data is removed from O4U's records in writing utilizing the contact information below.

Document Retention: O4U retains records only for as long as necessary to meet applicable legal, regulatory, operational, and historical requirements. Records will be securely stored, appropriately protected, and disposed of. Records must be stored in secure physical or electronic locations with appropriate access controls. Confidential or sensitive records must be protected from unauthorized disclosure. Records that have reached the end of their retention period and are not subject to a legal hold may be destroyed in a secure manner.

If O4U becomes aware of pending or potential litigation, audit, or investigation, all relevant records must be preserved and all legal holds remain in effect until formally lifted.

Hubspot's (O4U's CRM) Data Retention Policy is available at <https://legal.hubspot.com/dpa> for more information.

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Compliance and Review: O4U will regularly review and update this Policy to ensure compliance with changes in laws, regulations, and organizational needs.

Enforcement: All employees and volunteers are responsible for adhering to this policy. Violations may result in disciplinary action, up to and including termination of employment or volunteer service.

Contact Information: For questions or concerns regarding this policy, please contact Amanda Zielinski Slenski, Deputy Executive Director, at amanda@outforundergrad.org.