The AET

Data Retention and Disposal Policy



Purpose and Scope

This Data Retention and Disposal Policy addresses how a customer's data is retained and disposed of and to ensure this is carried out in a consistent manner. From time to time, The AET may update this policy. This policy is guided by security requirements specific to The AET including compliance with applicable laws and regulations.

This policy applies to all The AET assets utilized by personnel acting on behalf of The AET or accessing its applications, infrastructure, systems, or data. All personnel are required to read, accept, and follow all The AET policies and plans.

Data Retention

The time period for which The AET must retain customer data depends on the purpose for which it is used. The AET must retain customer data for as long as an account is active or in accordance with the agreement(s) between The AET and the customer, unless The AET is required by law or regulation to dispose of data earlier or retain data longer.

Data Disposal

The AET must dispose of customer data within 30 days of a request by a current or former customer or in accordance with the Customer's agreement(s) with The AET. The AET may retain and use data necessary for the contract such as proof of contract in order to comply with its legal obligations, resolve disputes, and enforce agreements. The AET hosting and service providers are responsible for ensuring the removal of data from disks allocated to The AET use before they are repurposed and the destruction of decommissioned hardware.

Only a limited number of The AET employees should have access to delete customer data.

Upon employee or contractor termination, company-owned devices will be collected and sanitized prior to device re-issuance in accordance with NIST Guidelines for Media Sanitization (NIST S.P. 800-88 Rev. 1).

Exceptions

The AET business needs, local situations, laws and regulations may occasionally call for an exception to this policy or any other The AET policy. If an exception is needed, The AET management will determine an acceptable alternative approach.

Enforcement

Any violation of this policy or any other The AET policy or procedure may result in disciplinary action, up to and including termination of employment. The AET reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. The AET does not consider conduct in violation of this policy to be within an employee's or contractor's course and scope of work.

Any employee or contractor who is requested to undertake an activity that he or she believes is in violation of this policy must provide a written or verbal complaint to his or her manager or any other manager of The AET as soon as possible.

The disciplinary process should also be used as a deterrent to prevent employees and contractors from violating organizational security policies and procedures, and any other security breaches.

Responsibility, Review, and Audit

The AET reviews and updates its security policies and plans to maintain organizational security objectives and meet regulatory requirements at least annually.

This document is maintained by Roger Hanagriff.

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