

Data Retention and Disposition Guideline

Disclaimer These materials are internal BTC guidelines for awareness and consistency. They are not a contract, promise, or guarantee of specific outcomes. BTC may interpret, modify, or suspend this guidance at any time. Where law, partner requirements, or a signed agreement require different handling, that requirement controls. Questions or exception requests: support@bigthinkcapital.com.

Purpose Offer a reasonable starting point for how long BTC may keep common record types and how to dispose of them when they are no longer needed. These are general guidelines and may be adapted based on partner requests or legal holds.

Suggested Timeframes - Application records and key supporting documents. Often retained up to 7 years after the last meaningful activity. - Bank statements, financial statements, and ID images. Often retained up to 7 years. - Call recordings and voicemail. Often retained up to 2 years unless a case needs longer review. - Email. Often retained up to 2 years by default unless under a legal hold. - Chat logs on approved platforms. Often retained up to 1 year. - HR files. Often retained up to 7 years post termination. I-9 follow federal guidance. - Access logs and device compliance logs. Often retained up to 1 year.

Disposition Ideas - Paper. Use cross cut shredding via an approved vendor. - Electronic. Use secure delete or wipe. Empty recycle bins and confirm backups rotation. - Credit reports. Avoid storing full reports. If temporarily present for review, remove them once the decision process is complete.

Legal Holds If a hold is announced, pause deletion and keep the affected data until the hold is cleared. If you are unsure, email support@bigthinkcapital.com.

Exceptions If a team needs to deviate from this guidance, email support@bigthinkcapital.com with the context, risk, and temporary controls. Keep exception decisions in writing.