

CATEGORY	DESCRIPTION OF RECORDS	RETENTION PERIOD*
Internet, Network, and Computer Activity	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, usage history, system and file access logs, security clearance level, and information regarding any individual user's or device's interaction with our websites, apps, or advertisements, or related to usage of Company networks, servers, intranet, shared drives, or Company-issued computers and electronic devices.	4 years
Mobile Device Security Information	Data identifying mobile devices accessing Company networks and systems (whether by employees, customers, or others), including cell phone make, model, and serial number, cell phone number, and cell phone provider.	4 years
Online Portal and Mobile App Access and Usage Information	Username and password, account history, usage history, file access logs, and security clearance level for all Company online accounts (whether internal for use by employees, or external customer accounts) accessible via browser or app.	4 years
Phone Logs	Phone Logs from Company-owned devices and phone lines, unless related to a Category below that requires a longer retention period.	4 years
E-mails, Texts, Chat, and Other Electronic Communications	Electronic Mail (E-mail), Text Messages, Instant Messages (IM), Teams chat, Zoom chat, unless related to a Category below that requires a longer retention period.	4 years
Electronic Devices Issued to Employees	Laptop hard drive	2 years after device is returned by employee, or forensically image the device before putting it back into circulation; less time may be appropriate if the employee did not have access to sensitive data on the device or there is no risk that content on the device will become relevant in near future or litigation
	PC Hard drive	
	Company smart phone, tablet or iPad	
	Other electronic devices issued to employees	

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Geolocation Data	IP address and/or GPS location (latitude & longitude). This includes such data collected about devices accessing Company websites, apps, advertisements, networks, servers, systems, computers, or devices. It also includes such data collected on or via Company-issued computers, electronic devices, and vehicles, as well as in timekeeping applications on cell phones used to clock in and out and that log the geographic location at which each time entry was made.	4 years
Biometric Data	Biometric identifiers, such as fingerprints, retina scans, facial recognition, or handprint, which the Company collects and uses for verifying an employee's or other persons' identity.	For as long as in use to verify the person's identity to provide access to Company systems or facilities
Visual, Audio or Video Recordings	Surveillance camera footage, which may record or capture video or images of employees, customers, visitors, vendors, and anyone else in our offices or facilities.	90 Days
	Recorded virtual meetings, such as recorded Zoom or Teams meetings.	6 years
	Employee pictures or photos taken for identification purposes (employee ID cards), or for use in a Company directory or on a Company website, or for other business purposes that are disclosed to the employee.	Duration of employment plus 6 years
	Pictures, photos, or video taken at a Company function or event, which may include employees, customers, visitors, or other third parties.	6 years
	Pictures, images, photos or videos of employees or customers posted on social media to which the Company or its managers have access or that are submitted to the Company by another employee, customer or third party.	6 years
Talent Acquisition, Recruiting & Hiring Records	Job requisitions and orders to recruiters, staffing agencies.	4 years after decision to fill the position
	Job ads & job postings.	
	Job applications, resumes, cover letters, and all other inquiries, letters, communications, or data received from applicants or candidates who never became employed by the Company or the Company's customers (worksite employers).	

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	Offer letters to applicants or candidates who never became employed by the Company or the Company's customers (worksite employers).	
	Background checks, consent forms, reports, correspondence of/with applicants or candidates who never became employed by the Company or the Company's customers (worksite employers).	
	Fair Credit Reporting Act Certifications	
	Interview notes from interviews of applicants or candidates who never became employed by the Company or the Company's customers (worksite employers).	
	Evaluation or assessment forms regarding the qualification or candidacy of applicants or candidates who never became employed by the Company or the Company's customers (worksite employers).	
	EEO-1 forms, data, and reports for employees of the Company or the Company's customers (worksite employers).	
	Interview notes from interviews of employees who were hired and became employed with the Company or the Company's customers (worksite employers).	Duration of employment plus 6 years
	Portfolios or sample work product of employees who were hired and became employed with the Company or the Company's customers (worksite employers).	
	Evaluation or assessment forms regarding the qualification or candidacy of applicants or candidates who were hired and became employed with the Company or the Company's customers (worksite employers).	
Non-Personnel File Records ¹ Related to Employee Selection, Promotion, Performance Management, Training, Retention, and Termination	Non-personnel file records related to promotions and demotions of employees or worksite employees.	6 years
	Non-personnel file records related to transfers and reassignment of employees or worksite employees.	
	Non-personnel file records related to employee or worksite employee performance evaluations and reviews.	
	Non-personnel file records related to requests for accommodation of disabilities and reasonable accommodations provided by Company or the Company's customers (worksite employers).	

¹ "Non-Personnel File Records" means records that do not pertain to only one employee or that are not maintained in an employee's personnel file. Generally, Non-Personnel File Records refers to management or HR records pertaining to two or more employees.

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	Non-personnel file records related to new hire orientation and onboarding of employees or worksite employees. Non-personnel file records related to training of employees or worksite employees. Non-personnel file records related to employee or worksite employee terminations. Federal or State WARN Notice Records and Data Salary Guidelines and Wage Surveys for employees of the Company or the Company's customers (worksite employers).	
Workplace Investigation Records of Company employees and/or worksite employees	Written or recorded witness statements Notes from witness interviews Documentation gathered in investigation file Investigation findings and reports	Duration of subject employee's employment plus 6 years
Payroll, Time, and Expense Records of Company employees and/or worksite employees	Time sheets, time cards, and records of total hours/time worked and meal breaks taken each day and workweek, including straight time and overtime hours Records of employee and/or worksite employee wages and deductions each pay period, including dates of paychecks and amounts of wage payments and wage rates Records of paid sick leave provided and used Records of vacation or other paid time off Expense reimbursement records (receipts, requests, reports, agreements, records of reimbursement, communications regarding expenses) Wage garnishment records	Duration of employment plus 6 years
Personnel Files & Individual Employee/Worksite Employee Records	Job applications, resumes & cover letters Background checks, consent forms, and correspondence Offer letters & pre-employment correspondence New hire forms (W-4 forms, direct deposit authorization, emergency contacts, etc.) and policy acknowledgments Arbitration Agreement Non-Disclosure, Confidentiality Agreement (or other restrictive covenant agreement) Performance evaluations and feedback Disciplinary records and write-ups Training records Business travel records Licensing and certification records	Duration of employment plus 6 years

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	Complaints about or from the employee or worksite employee Time off and vacation requests Attendance, absence, and tardiness records and communications Non-medical leave of absence records Non-medical workplace injury, accidents, and safety records Termination records, checklist, notices	
Employee and/or Worksite Employee Medical Information	Doctor's notes for absences or work restrictions Medical leave of absence records, including requests, forms, documentation, and correspondence (FMLA, CFRA, PDL, USERRA, ADA, FEHA, etc.) Requests for accommodation (ADA, FEHA) Interactive process records, including correspondence with the employee or worksite employee and their medical or mental health provider(s) regarding any request for accommodation or medical leave of absence Pre-hire and post-hire drug test results Infectious disease records related to symptoms, exposure, contact tracing, diagnosis, testing, or vaccination, including COVID-19 Medical and health information provided to the Company for an employee or worksite employee's family members, friends, co-workers, and other associates related to any infectious disease (including COVID-19) symptoms, exposure, diagnosis, testing, or vaccination, as well as information related to their travel and whom they have been in close contact with during the applicable infectious period Medical records related to an individual employee or worksite employee's workplace injury or accident All other employee or worksite employee disability records	Duration of employment plus 6 years
Employee/Worksite Employee Immigration Records	I-9 Forms Work visa applications, correspondence, and records	3 years from date of hire or 1 year after termination, <i>whichever is longer</i> If not employed, 3 years; if employed, duration of employment plus 3 years
	Group insurance records, including plan documents, communications regarding coverages and benefits	As long as Plan is active, plus 6 years

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Employee/Worksite Employee Benefits Records	Individual employee or worksite employee benefits enrollment and election forms, including benefits for dependents, family members, and beneficiaries	Duration of employment plus 6 years
	COBRA records and notices	6 years
	All plan documents, summary plan descriptions (updated with changes and modifications), and amendments to such documents	Indefinitely
	For the 401(k) plan, all death beneficiary designations and year-end detailed trust reports showing all annual trust activity, including records of plan distributions to participants and beneficiaries	
	Subject to the above categories that are retained indefinitely, ERISA Plan Participant Documents	Duration of employment plus 10 years
	Subject to the above categories that are retained indefinitely, ERISA reports and disclosures related to all pension and welfare plans, including: annual reports, notice or reportable events (such as plan amendments that may decrease benefits, a substantial decrease in the number of plan participants, etc.), plan termination	
Workers' Compensation Records	Insurance policy records and terms of coverage	6 years after claim is closed or 5 years after end of employment, <i>whichever is later</i>
	Medical files and records pertaining to filed claims	
	Claim files, including letters, forms, reports, etc.	
Safety, Injury, and Toxic Exposure Records	Injury & Illness Prevention Program records	Indefinitely
	OSHA Logs (300, etc.)	Duration of current calendar year plus 5 years
	On-the-Job Injury Reports	
	Medical exams and toxic exposure records	Duration of employment plus 30 years
Customer Records, Communications and Data	Loyalty program records, email lists, and customer account information	Duration of relationship with customer plus 4 years
	Inferences – customer profile information created based on analysis of other information collected about or from customers, including inferences regarding customers' preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Duration of relationship with customer plus 4 years
	Data analysis, such as metrics on traffic to the website or app, impressions, reach, AOV, etc.	Duration of relationship with customer plus 4 years

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	Marketing emails and email campaign records, including reactivation emails and Unsubscribe escalation records	4 years
	Marketing performance records, reports, meeting notes, and presentations	4 years
	Social media messages from / to customers	4 years
	Customer service communications, records, and calibrations, including all call center records	4 years
	Merchandise complaint and loss communications, records, and calibrations	4 years
Facility & Systems Access Records	Information identifying all individuals accessing secure Company facilities, systems, networks, computers, and equipment and at what times using their keys, badges, fobs, login credentials, or other security access method.	4 years

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