



Summit Direct Mail

Summit Direct Mail Data Retention Policy

Version 1.0

January 21, 2016

1. **Scope:** All Summit Direct Mail associates and systems receiving, sending, printing or storing secured data.
2. **Requirements:** Define the methodology for archiving, retaining, and disposing of confidential and proprietary information used within the course of daily business activity.
3. **Detailed Procedure:**

Terms and Definitions

Data	Individual elements of fact maintained by the company's information system.
Information	Aggregated or summarized data leading to a greater understanding of a business problem.
Classification	An administrative understanding used for the purposes of easily identifying broad categories of data and information.

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- Record A "record" is data or information of any kind, expressed in either ordinary or machine language, which serves as a memorial or permanent evidence of whatever business matter it relates to.

- Flat-File An electronic storage container of a single sequential file, housing whatever records of business matter it relates to.

- Database An electronic storage service housing whatever records of business matter it relates to.

- Active Data or information that remains a part of the information system because of its on-going relevance to the business process it relates to.

Information and Retention Schedules

Data and Information	Classification	Retention
Production or Processing Data	Financial	30 Days (note: cardholder data is restricted to retention period of 30 days active and 90 days storage unless explicit permission is obtained from the issuer)

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for business, legal and/or regulatory purposes)

Current Processing File	System	1 Day (end of shift / end of day)
Firewall Logs	System	1 Year
Application Logs	System	1 Year
Audit Logs	System	1 Year
Backup Logs	System	1 Year
Data Disposal Logs	System	Indefinitely

Archival and Retention Policy

1. All electronic information identified in the Information and Retention Schedules of this policy will be retained for the Retention Period specified.
2. Decisions will be made annually by the Summit Direct Mail Security Committee on whether to permanently archive information that exceeds their retention period and enter into a dormant classification.
 - a. Instructions to dispose of or permanently retain dormant information will be passed from the Summit Direct Mail Security Committee to the designated technician in writing.
 - b. Data deletion procedures issued from the Security Committee will specify approved method of data destruction for the media involved (e.g., paper, backup tapes, etc.).

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- c. Cardholder data on the personalization equipment will be deleted as soon as the job is completed, but no later than end of shift or end of day.
- d. The manual deletion of data must be confirmed and attested to by sign off by a second person.

Compliance review

1. A monthly report summarizing the disposal of electronic media will be provided by the Security Director as oversight of archival/disposal activities.
2. A quarterly audit will be conducted to ensure that all data beyond the data retention period has been deleted.
3. For additional verification, it is suggested that a program be written which scans storage areas for stale data matching certain masks (16 digit account numbers, SSNs, etc.) and alerts the team as to their existence.

Disposal policy

1. The first method of disposal is the final destruction of dormant electronic media by physical force.
2. The second method of disposal may involve electromagnetic degaussing or software sanitation meeting the standards detailed in the US Department of Defense Industrial Security Program Operating Manual DOD 5220.22-M (<http://www.dss.mil/isec/chapter8.htm>)
3. Records concerning the destruction of physical media will be maintained indefinitely. At a minimum, the following information will be recorded:
 - a. Brand, make, manufacturer, and serial number.

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- b. A brief description of the media and/or information, and who was assigned to perform the destruction.
 - c. The date, time, and witness of physical destruction.
 - d. Paperwork and receipts, if any, provided by 2nd party vendors, consultants, software, or services involved with the disposal of the media.
4. A monthly report summarizing the disposal of electronic media will be provided to the Security Director as oversight of disposal activities.

Revision History

Version 1.0	01/21/2016	Erol Onyuru	Initial Draft
Version 1.0	08/01/2016	Charles Buchanan	Approved
Version 1.0	05/30/17	C.Buchanan	Annual Review - Approved with no changes

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