



EXHIBIT 1 TO AGREEMENT FOR SERVICES BY AFFILIATE

NPI Data Retention Policy

1. Purpose

This document establishes periods for disposal and retention of business records intended for internal use. These guidelines apply to all such records irrespective of the medium in which they exist (e.g. paper, video or audio tape, microfilm or microfiche, or hard drive, disk, or other electronic storage device).

Topics covered in this document include:

- Retention Schedule
- Data Destruction
- Document Shredding

2. Retention Schedule

Unless otherwise identified herein or otherwise provided by policy, the retention periods identified below shall govern the retention period of all records.

2a. Customer Transactions

Transaction Type	Online	Archive	Offline (Cold Storage)
All, except as noted below	60 days	n/a	n/a
Raw data from bureaus (data sent from bureaus to 700C)	15 days	n/a	n/a
Applicant data (data sent from bureaus to 700C)	5 mo.	5 mo. - 25 mo.	25 mo. - 5 years
Report data, html version (sent from 700C to dealer)	6 mo.	6 mo. - 2 years	2 years – 5 years
Report data, TTY raw version (sent from 700C to dealer)	6 mo.	6 mo. - 2 years	2 years - 5 years
Driver's license photos	5 mo.	5 mo. - 25 mo.	n/a

2b. Consumer Data Privacy

Consumer requests submitted under the California Consumer Privacy Act and similar consumer data laws, and related documents, shall be retained for 24 months.

3. Data Destruction

1. Documents stored as electronic data shall be destroyed according to the category the record best fits within policy.
2. These methods should be used to destroy physical media if the media was previously used to store sensitive data. Drive destruction or drive wiping (DoD-3) is completed as follows:
 - a. Drive destruction is performed by an approved third-party vendor and vendor provides certificate of destruction.

- b. Drive wiping is performed by an employee using a third-party tool.
- 3. When deleting (clearing) documents on an employee managed workstation, it is recommended employees and contractors delete the files and empty the recycle bin to permanently clear the data. Email that is "deleted" remains in the "Deleted Items" folder for the duration of the email retention period unless manually deleted sooner.

4. Document Shredding

Records in tangible form (i.e., paper, fabric, plastic, small electronics, and metals, including CDs, USB drives, and DVDs/CDs) shall be destroyed by shredding.

Records that are classified as secret, confidential, or sensitive must be destroyed in this manner. If shredding is not immediately available, employees and contractors are encouraged to hold records until it is available.