



E1 Unico Corporation

Data Retention and Disposal Policy

Effective Date: June 2026 | **Version:** 1.0 | **Classification:** Internal / Regulatory

Policy Owner: Manuel Montemayor Jr., Founder & CEO

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BBB Accredited Business

Policy Statement: E1 Unico Corporation maintains a defined, enforced, and periodically reviewed Data Retention and Disposal Policy in compliance with applicable federal and Texas state data privacy laws, including GLBA, FCRA, and the Texas Business & Commerce Code. Data is retained only as long as necessary for its stated business or legal purpose — and disposed of securely and irreversibly when no longer needed. Consumer financial data received via Plaid is subject to the strictest retention controls in this policy.

1. Scope

This policy governs the retention and disposal of all data collected, processed, or stored by E1 Unico Corporation and the UnicoOS platform, including:

- Consumer financial data received from the Plaid API (account balances, transactions)
- Personally Identifiable Information (PII) — names, emails, phone numbers, addresses
- Business records — invoices, contracts, payment records
- Authentication data — user accounts, session tokens, access logs
- Communications data — SMS logs, email logs, call records
- System and security logs — application logs, access audit trails

2. Data Retention Schedule

Data Category	Retention Period	Legal Basis	Type
Consumer financial data (Plaid) Account balances, transaction history, access tokens	Duration of active account + 90 days after account closure or bank disconnection	GLBA; Plaid Developer Policy	Financial
Payment records Invoice history, payment confirmations, Stripe records	7 years from transaction date	IRS record-keeping requirements; Texas Tax Code	Legal / Tax

Customer PII Names, emails, phone numbers, addresses	Duration of active account + 2 years after account closure	Texas Business & Commerce Code §521	Business
User account data Login credentials, profile data, settings	Duration of active subscription + 30 days after cancellation	Contractual; user request	Business
SMS & communication logs Message history, opt-in/opt-out records	4 years (TCPA compliance)	TCPA; FCC regulations	Legal
Security & access logs Application logs, authentication events, API audit trails	12 months rolling	Security operations; incident response	Security
Backup data Database snapshots and backups	30 days rolling (automated backup rotation)	Business continuity	Operational
Contracts and signed documents E-signatures, proposals, agreements	7 years from document date	Texas Statute of Limitations; contract law	Legal

3. Consumer Financial Data — Plaid-Specific Rules

Consumer financial data received from the Plaid API is subject to enhanced retention controls in compliance with Plaid's Developer Policy and GLBA:

- **Access tokens:** Plaid access tokens are stored encrypted (AES-256) and revoked immediately when a user disconnects their bank account via the UnicoOS dashboard or submits a deletion request
- **Transaction data:** Bank transaction records are retained for the duration of the active account to support the Banking & Accounting features — and purged within 90 days of account closure
- **No secondary use:** Financial data received from Plaid is used solely to provide the Banking & Transactions features within UnicoOS — it is never used for advertising, sold to third parties, or shared beyond what is required to operate the service
- **User-initiated deletion:** Users can disconnect their bank account and request deletion of all associated financial data at any time — processed within 30 days

4. Data Disposal Procedures

4.1 Secure Deletion — Database Records

- When a user account is closed or data reaches end of retention, records are permanently deleted from the Neon PostgreSQL database using hard deletes (not soft deletes)
- Associated Plaid access tokens are revoked via the Plaid API before deletion to terminate data access at the source
- Cascading deletes ensure all child records (transactions, connections, logs) are removed with the parent record

4.2 Secure Deletion — Backups

- Database backups are automatically rotated on a 30-day cycle by Neon — older backups are permanently deleted by the provider
- When a user requests immediate data deletion, the deletion is applied to the live database. Backup copies are purged at the next backup rotation cycle (within 30 days)
- Users are notified that backup purging may take up to 30 days to complete

4.3 Secure Deletion — File Storage

- Uploaded documents and files are permanently deleted from storage when the associated record is deleted
- Deletion is verified — storage provider confirms successful removal before the deletion request is marked complete

4.4 Physical Media

- E1 Unico Corporation does not operate physical servers — all data is stored in cloud infrastructure
- Physical media disposal is handled by SOC 2 certified infrastructure providers (Neon/AWS) in accordance with NIST 800-88 media sanitization guidelines

5. User Rights and Deletion Requests

- Users may request deletion of their data at any time by emailing **Unico@E1Unico.com** or using the account deletion feature in UnicoOS Settings
- Deletion requests are acknowledged within **5 business days** and completed within **30 days**
- Data subject to legal hold (e.g., tax records, legal disputes) is retained for the applicable legal period before disposal
- Users receive written confirmation upon completion of their deletion request

6. Policy Review and Enforcement

- This policy is reviewed **annually** by the CEO and updated to reflect changes in applicable law, Plaid Developer Policy requirements, or business operations
- Enforcement is built into the UnicoOS platform architecture — retention periods and deletion workflows are automated where possible
- Any identified non-compliance with this policy is treated as a security incident and remediated within the applicable SLA
- Policy review dates and changes are documented and maintained for audit purposes

7. Applicable Laws and Regulations

Law / Regulation	Applicability
Gramm-Leach-Bliley Act (GLBA)	Governs retention and protection of consumer financial information
Fair Credit Reporting Act (FCRA)	Governs use and retention of consumer financial data
Texas Business & Commerce Code §521	State data breach notification and consumer data protection
TCPA / FCC Regulations	SMS opt-in/opt-out record retention requirements
IRS / Texas Tax Code	7-year retention of financial and business records
Plaid Developer Policy	Restrictions on use, retention, and deletion of Plaid-sourced financial data

Policy Approval

This Data Retention and Disposal Policy has been reviewed, approved, and is actively enforced across all E1 Unico Corporation systems as of the effective date below.

Authorized Signatory

Date

Next Review

Manuel Montemayor Jr., Founder & CEO
E1 Unico Corporation

Annual — June 2027