

Data Retention & Disposal Policy

Effective Date: January 3, 2026

Review Cycle: Annual (Next Review: January 2027)

1. Purpose

This policy establishes the timeframe for which OTG retains data and the secure methods used for its permanent destruction. Our primary objective is to comply with the GDPR principle of "**Storage Limitation**"—keeping data only as long as necessary.

2. Retention Principles

- **Client Data (PII):** OTG acts as a Processor. We do not determine retention periods for client data; we follow the specific retention schedules defined in the **Client SLA**.
- **Zero-Persistence Rule:** Unless explicitly requested by the client for legal reasons, OTG agents shall not store PII on local drives. All data remains within the client's cloud ecosystem.
- **Corporate Records:** Business-critical records (contracts, invoices, tax filings) are retained for **7 years** to comply with Pakistan's statutory requirements.

3. Retention Schedule (Standard)

Data Category	Retention Period	Reason
Customer PII	Duration of Contract + 30 Days	Service Delivery
Call Recordings	90 Days (unless specified)	Quality Assurance
CCTV Footage	30 Days	Facility Security
Employee Records	5 Years post-employment	Labor Law
System Logs	90 Days	Security Auditing

4. Secure Disposal Methods

When data reaches its "End of Life," OTG ensures it is rendered unrecoverable:

- **Physical Media:** Any paper containing sensitive info must be destroyed using a **Cross-Cut Shredder (Level P-4)**. Hardware (HDDs/SSDs) slated for decommission must be physically crushed or degaussed.
- **Digital Data:** We utilize **Secure Wipe** software that overwrites data multiple times (meeting DoD 5220.22-M standards) to ensure it cannot be recovered by forensic tools.
- **Client Cloud Data:** Upon contract termination, OTG will provide a **Certificate of Destruction** confirming that all local access points and temporary caches have been purged.

5. Litigation Hold

If OTG receives a legal notice or "Litigation Hold," the normal disposal schedule is immediately suspended for the relevant data until the legal matter is resolved.