Data Security, Destruction, and Retention Policy

Effective Date   7/8/2020

Version   2.0

This policy sets forth Shalom Ministries International, Inc's (DBA Discovering the Jewish Jesus) policy regarding the security, destruction, and retention of certain documents and data. This policy covers both paper hard-copies and electronic media. The policy also ensures that documents and data are promptly provided to authorities in the course of legal investigations or lawsuits. If you have any questions or concerns regarding this policy, please contact us using the information listed below.

Discovering the Jewish Jesus   privacy@discoveringthejewishjesus.com   +1 -517- 920-4878
PO Box 777
Blissfield, MI 49228 USA

Provision of Documentation and Data for Investigations or Litigation

Documents and data requested or subpoenaed by legally authorized parties will be provided within five business days. No document or data will be concealed, altered, or destroyed with the intent to obstruct any legally authorized request, investigation, or litigation.

Document and Data Security

All documents containing bank card, debit card, or credit card Primary Account (PAN) and the 3- or 4-digit Card Verification Code (CVC) are classified as highly confidential. These documents are kept in a secure, controlled access environment until after the transaction processing has occurred. The PAN and CVC are de-identified through masking.

PAN data stored on electronic media is encrypted. CVC data is used with the initial transaction, but is not stored on any electronic media, hard drive, or on any computer for any reason. No PAN's and/or CVC's are sent via end-user messaging technology (ex. emails, chats) under any circumstances.

For further security, once a computer is retired the hard drive is removed from the computer and stored in a secured, controlled access area until it can be destroyed.

Document and Data Retention Schedule

At least one copy of each type of document or data listed below will be retained according to the specified time periods listed below. The types of information that may be retained with the documents or data is listed in our "Privacy Policy". Document and data review and deletion will be performed on an as-needed and/or quarterly basis to ensure compliance with the retention schedules listed below.

- ❖ 7-Year Minimum Retention
  If you have donated to, or purchased merchandise from, Discovering the Jewish Jesus, we are legally required to retain records of these transactions for a minimum of 7 years.
  - ➢ Bank deposit reports related to donations and product orders
  - ➢ Acknowledgement letters, receipts, and tax statements
  - ➢ De-identified or encrypted credit or bank card information and reports related to donations and product orders.
- ❖ 2-Year Retention
  If you have provided personal information to Discovering the Jewish Jesus by postal mail, email, or by phone that is not directly related to a donation or product order, your personal information data will be deleted after 2 years.
- ❖ 1-Year Retention
  If you provided information by using our website https://discoveringthejewishjesus.com/, and the information is not directly related to a donation or product order, your data will be deleted within 1 year.
  - ➢ This type of data includes, but is not limited to, items like prayer requests, testimonies, requests for information, customer service requests, and cookie permissions.
- ❖ 90-Day Retention
  - ➢ Original copies of checks and envelopes related to donations or product orders
  - ➢ Original copies of envelopes that contained cash donations or product orders
  - ➢ Recorded phone calls
  - ➢ Voicemails
  - ➢ Emails.
- ❖ Immediate Destruction After Intended Use
  Data and documents will be deleted or destroyed after their intended use. This policy only applies if the document or data is not needed for future follow-up, is not governed by one of the other Document and Data Retention Schedules, and is not needed for legal purposes.
  - ➢ This type of data may include, but is not limited to, items that are received in the postal mail, like prayer requests, testimonies, and letters.

Document and Device Destruction

All hardcopy paper documents containing Personally Identifiable Information (PII) or financial information for which the retention period has passed are placed in secure locked bins until they can be destroyed.

When a computer, cell phone, or hard drive is retired from use, the device is stored in a secured, controlled access area until it can be destroyed.

Discovering The Jewish Jesus uses a professional service to perform both document and device destruction:

>AccuShred
>114 W. Central Avenue
>Toledo Ohio 43610
>Toll Free: 1 (800) 747-3341
>https://accushred.net/

AccuShred has a AAA certification with the National Association for Information Destruction (NAID) and maintains compliance with the following United States federal privacy laws:

- FACTA
- HIPAA
- Gramm-Leach-Bliley

Secure locking bins are provided by AccuShred. The containers are used to hold all hardcopy paper documents that are past their retention period and are ready for destruction. Discovering The Jewish Jesus has one key to access the onsite bins. This key is kept in a secured, controlled access area that is only available to authorized personnel. These bins are picked up and replaced monthly by secured trucks. The bins remain locked until they are delivered to a secure document destruction facility. This facility performs mass shredding operations of paper materials that are shredded into ½" pieces.

Electronic devices and computer equipment are destroyed on an "as needed" basis. AccuShred physically shreds all hard drives and dismantles and recycles the other items.

AccuShred leaves service tickets to show acceptance of legal responsibility to destroy the documents or device taken into their possession. After completion of the shredding services, they provide an itemized invoice and a notarized Certificate of Destruction. This is a legal document that Discovering The Jewish Jesus retains for proof of our effort to protect personal and sensitive information and data.