

## APHON DATA RETENTION POLICY

This document outlines APHON's data retention policy for membership and non-member customers and prospects who have registered information via [www.aphon.org](http://www.aphon.org). It is designed to ensure compliance with data protection laws including GDPR, PIPEDA, and CCPA (see 4.1 below), and to support operational and legal requirements. For our NCPD Accreditation requirements, we must keep education activity files in a retrievable format (electronic or hard copy) for a period of 6 years.

Adherence to this policy will be owned by the APHON Board Secretary and Executive Director.

**Also, reference: APHON Privacy Policy**

### 1. Membership Data

#### 1.1 Scope

Applies to all personal data collected and processed in the context of:

- Membership enrollment and renewals
- Payment of dues
- Participation in educational programs
- Volunteer engagement and service records

#### 1.2 Retention Periods

Data Type	Retention Period	Justification
Membership records (e.g., name, contact info, membership status)	7 years after membership ends	To support re-engagement, historical reporting, and legal inquiries
Dues payment records (e.g., invoices, receipts, payment method)	10 years	Required for financial auditing and tax compliance
Education course participation (e.g., course history, CE credits)	7 years	To support credentialing, member inquiries, and accreditation
Certificate holders (e.g. Chemotherapy Biotherapy Provider)	2 years after expiration	To support credentialing, member inquiries, and accreditation
Volunteer activity records (e.g., roles, hours, evaluations)	5 years after last activity	For recognition, references, and historical reporting
Past APHON Board Members	Permanent (name and contact information only)	As elected officials of the organization, data for these individuals should remain on file.
Awardees	Permanent (name and contact information only)	To maintain historical records
Grantees	10 years	Required for financial auditing and tax compliance

### 1.3 Data Minimization & Anonymization

After the retention period ends, the data will be:

- Anonymized for statistical or research purposes, where appropriate
- Securely deleted if no longer necessary
- Data disposal should occur annually at a date established by headquarters staff in Q1 or Q2.

## 2. Non-Member Customer Data

### 2.1 Scope

Covers individuals who, without becoming members, have transactions with APHON such as:

- Registered for educational content (e.g., webinars, courses, events)
- Purchased products
- Downloaded resources

### 2.2 Retention Periods

Data Type	Retention Period	Justification
Education participation records (e.g., course sign-ups, CE tracking)	7 years	To support follow-up engagement and reporting, while minimizing long-term data exposure
Prospect contact information (e.g., name, email, organization)	2 years from last interaction	To allow for targeted outreach and conversion tracking
Marketing engagement data (e.g., email opens, event RSVPs)	2 years	For analytics and campaign optimization

### 2.3 Data Minimization & Anonymization

After the retention period:

- Data will be anonymized for aggregate reporting where feasible.
- Personally identifiable information (PII) will be securely deleted
- Data disposal should occur annually at a date established by headquarters staff in Q1 or Q2.

## 3. Non-Member Prospect Data

### 3.1 Scope

Covers individuals who, without becoming members, have registered on [www.aphon.org](http://www.aphon.org) and provided an email address and other personally identifiable information. These individuals have not made a purchase and therefore APHON does not have a business relationship with them.

## 3.2 Retention Periods

Data Type	Retention Period	Justification
Prospect contact information (e.g., name, email, organization)	2 years from last interaction (website log-in)	To allow for targeted outreach and conversion tracking
Marketing engagement data (e.g., email opens, event RSVPs)	2 years	For analytics and campaign optimization

## 3.3 Data Disposal

After the retention period:

- APHON will delete the full account and data from the database.
- Data disposal should occur annually at a date established by headquarters staff in Q1 or Q2.

# 4 Legal Basis and Review

## 4.1 Legal Basis

Retention periods are based on data privacy laws where APHON members and customers may reside, including but not limited to:

- **GDPR** which stands for the **General Data Protection Regulation**. It is a regulation in the European Union (EU) that aims to protect the privacy and personal data of individuals within the EU and the European Economic Area (EEA). It also addresses the transfer of personal data outside these areas.
- **PIPEDA** which stands for the **Personal Information Protection and Electronic Documents Act**. This is a Canadian law that governs how private sector organizations collect, use, and disclose personal information during commercial business.
- **CCPA** which stands for the **California Consumer Privacy Act**. It is a state statute intended to enhance privacy rights and consumer protection for residents of California, USA. The CCPA provides California residents with the right to know what personal data is being collected about them, to whom it is being sold, and the ability to access, delete, and opt out of the sale of their personal data.

Some guiding legal principles include, but are not limited to:

- GDPR Article 5(1)(e): Data must be kept no longer than necessary
- PIPEDA Principle 4.5: Personal information must be retained only as long as necessary
- CCPA §1798.100: Businesses must disclose and justify retention periods

## 4.2 Review

This policy and retention periods will be reviewed upon changes in legal or operational requirements or every three years.

**Document control:**

Original document/full revision date:	August 2025
Amended policy adopted:	
Next review date:	August 2028
Responsible body:	APHON Board