

Data Retention Policy

M2 Technology Group Pty Ltd (ABN 24 061 357 373)

Effective: 1 July 2026

This policy sets out how long M2 Technology Group Pty Ltd (“M2 Technology”, “we”, “us”, “our”) retains different categories of records, and how those records are disposed of once no longer needed. It supports our Privacy Policy and is the “Retention Policy” referred to in that document (see sections 4.4 and 9.0 of the Privacy Policy).

1.0 Purpose and Scope

This policy applies to all Personal Information and business records held by M2 Technology, whether in physical or electronic form, including records held in CommTrak, our email and productivity systems, our accounting systems, and backups. It applies to all M2 Technology staff and contractors who create, receive or manage such records.

The purpose of this policy is to ensure that:

- records are kept for as long as we have a legal, regulatory or legitimate business reason to keep them, and no longer;
- Personal Information is destroyed or permanently de-identified once it is no longer needed, consistent with Australian Privacy Principle (APP) 11.2 under the Privacy Act 1988 (Cth); and
- retention practices are applied consistently and can be explained to customers, CommTrak Customers, and regulators such as the Office of the Australian Information Commissioner (OAIC).

2.0 General Principles

- We collect and retain only the information reasonably necessary for the purposes described in our Privacy Policy.
- Default retention periods are set out in the schedule at section 4.0. A longer period will apply where required by law, where a record is subject to a legal hold (section 5.0), or where a specific contract requires it.
- Where a retention period expires, records are securely destroyed or permanently de-identified as soon as reasonably practicable, including corresponding copies held in backups, in the ordinary course of our backup cycle.
- CommTrak Data is treated differently from M2 Technology’s own business records, because it is entered, owned and controlled by CommTrak Customers. Our retention and deletion practices for CommTrak Data are designed to support CommTrak Customers’ own obligations, not to override them.

3.0 Legal Framework

This policy has been prepared having regard to the following Australian laws and generally accepted industry practice. It is not a substitute for legal advice, and should be reviewed periodically to confirm it remains current.

- Privacy Act 1988 (Cth), including APP 11.2 (destruction or de-identification of Personal Information no longer needed)
- Corporations Act 2001 (Cth), s286 (7-year retention of financial records)
- Income Tax Assessment Act 1997 (Cth) and A New Tax System (Goods and Services Tax) Act 1999 (Cth) (generally 5-year retention of tax-related records)
- Fair Work Act 2009 (Cth) and Fair Work Regulations 2009 (Cth) (7-year retention of employee records, where applicable)
- Limitation Act 2005 (WA) (6-year general limitation period for contract and most civil claims in Western Australia)
- Electronic Transactions Act 1999 (Cth) (validity and evidentiary treatment of electronically signed records)
- Spam Act 2003 (Cth) (consent and unsubscribe requirements for electronic marketing)

4.0 Retention Schedule

The table below sets out our standard retention periods by record type. Where a record falls into more than one category, the longer applicable period applies.

Record Type	Retention Period	Legal / Business Basis	Trigger for Period	Privacy Policy Ref.
Tax records (invoices, receipts, BAS records, GST records)	5 years	Income Tax Assessment Act 1997 (Cth); A New Tax System (GST) Act 1999 (Cth); ATO record-keeping requirements	End of relevant financial year	9.0
Other financial and billing records (invoicing, payment records, financial statements)	7 years	Corporations Act 2001 (Cth) s286	Date record created	9.0
Employee records (if/when applicable)	7 years	Fair Work Regulations 2009 (Cth) reg 3.44	End of employment	—
CRM records, general correspondence, support tickets	Duration of relationship, plus up to 7 years after	Limitation Act 2005 (WA) — 6-year general limitation period for contract claims, plus buffer; legitimate business, accounting and dispute-resolution needs	End of customer relationship	9.0
Electronic signature records and signed agreements between M2 Technology and its customers	Term of agreement, plus 7 years after expiry/termination	Limitation Act 2005 (WA); Electronic Transactions Act 1999 (Cth) — evidentiary integrity of e-signed records	Agreement expiry or termination	5.1, 9.0
CommTrak Data (CommTrak Customers' own client/contact data, incl. quotes signed via CommTrak's e-signature feature)	Life of active subscription; deleted after export window on cancellation	Held under instruction from, and for the benefit of, the CommTrak Customer	Subscription cancellation, after export opportunity given	4.4, 5.2

Record Type	Retention Period	Legal / Business Basis	Trigger for Period	Privacy Policy Ref.
Backup copies (all systems, including CommTrak backups at NextDC)	Purged in the ordinary backup cycle following deletion of the primary record	Business continuity / disaster recovery	Deletion of corresponding primary record	4.4
Direct marketing opt-out / suppression records	Indefinite	Spam Act 2003 (Cth); Privacy Act 1988 (Cth) — to ensure opt-outs continue to be honoured	From date of opt-out	6.0
Direct marketing consent records	Duration of relationship, plus 4 years	Spam Act 2003 (Cth); general civil limitation period	End of relationship or withdrawal of consent	6.0
Website analytics data	Per analytics provider's standard retention settings (commonly 14–26 months)	Provider default configuration	Ongoing / rolling	—
System, security and access logs	12 months	Security monitoring; readiness for Notifiable Data Breaches scheme obligations	Rolling	8.0

5.0 Legal Holds

Where M2 Technology reasonably anticipates or is notified of litigation, a regulatory investigation, or a similar legal process, records relevant to that matter will be retained until the matter is resolved and the hold is formally lifted by our Privacy Officer, irrespective of the standard retention periods set out above.

6.0 Destruction and De-identification

When a retention period expires, records are disposed of using methods appropriate to the format and sensitivity of the information, which may include:

- secure deletion of electronic records, including corresponding backup copies in the ordinary backup cycle;
- permanent de-identification, where retaining de-identified data supports a legitimate business purpose (such as aggregate reporting) and re-identification is not reasonably possible; and
- secure destruction (such as shredding) of physical records.

CommTrak Customers are responsible for exporting any CommTrak Data they wish to keep before their subscription ends, as set out in section 4.4 of our Privacy Policy.

7.0 Roles and Responsibilities

Our Privacy Officer is responsible for maintaining this policy, approving any legal holds, and ensuring retention and destruction practices are followed. Staff and contractors who handle

Personal Information or business records are responsible for following this policy in the course of their duties.

8.0 Review

This policy will be reviewed periodically, and whenever there is a material change to our products, services, technology providers, or relevant law, to ensure it continues to reflect our actual practices.