



Data Retention Policy

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Revision 1.1
NOVEMBER 1, 2025

REVISION HISTORY

This revision history lists all changes to this document, the date of each revision, and the reason for each revision.

<u>Rev.</u>	<u>Rev. Date</u>	<u>Revision Description</u>
1.0	11/01/2024	Initial Version
1.1	11/01/2025	RXO, Inc updates, annual review

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25.0 Data Retention Policy

25.0.1 Purpose

The purpose of this policy is to establish guidelines for the retention, archiving, and disposal of data across RXO Logistics. It ensures compliance with legal, regulatory, and business obligations while promoting efficient information management.

25.0.2 Scope

25.0.2.1 This policy applies to:

25.0.2.1.A All employees, contractors, and third parties handling RXO's data.

25.0.2.1.B All RXO subsidiaries, divisions, and operating entities, business units and departments.

25.0.2.1.C All formats (electronic, physical, backup) and systems containing RXO's data.

25.0.3 Policy Principles

25.0.3.1 Data must be retained for as long as necessary to fulfill legal, regulatory, contractual, and operational obligations.

25.0.3.2 Data should be securely disposed of once retention periods expire.

25.0.3.3 Data must be protected against unauthorized access, loss, alteration, and destruction during its retention period.

25.0.4 Responsibilities

Role	Responsibilities
Information Security Officer (ISO)	Enforce data retention controls and monitoring
Legal Department	Define legal and regulatory retention requirements
Department Heads	Identify data within their departments and enforce retention
All Employees	Follow data handling and retention procedures

25.0.5 Data Retention Schedule

Data Category	Retention Period	Disposal Method
HR Records (Employee Files)	Termination + 7 years	Secure shredding / Secure wipe
Finance Records (Invoices, Tax)	7 years	Secure shredding / Secure wipe
Customer Data (PII)	Relationship end + 5 years	Anonymization / Secure wipe

Email Records	3 years	Automatic archiving and deletion
Security Logs (Access, Audit	2 years	Secure deletion
Contracts and Agreements	Contract end + 6 years	Secure shredding / Secure wipe
ITSM Records (Incidents, Changes)	2 years	Secure deletion
Electronic PHI Data	6 years	Secure shredding deletion
CUI / Sensitive Federal Data	6 years	Secure deletion

25.0.6 Storage and Protection of Retained Data

25.0.6.1 Data must be stored in encrypted, access-controlled environments.

25.0.6.2 Backup data must be protected and follow identical retention rules.

25.0.6.3 Archival storage must ensure integrity, availability, and confidentiality.

25.0.7 Data Disposal

25.0.7.1 Upon expiration of the retention period, data must be securely destroyed.

25.0.7.2 Digital data: Secure erase, degaussing, or crypto shredding.

25.0.7.3 Physical documents: Cross-cut shredding, pulping, or incineration

25.0.7.4 Disposal must be documented, and certificates of destruction retained where applicable.

25.0.8 Exceptions

25.0.8.1 If a litigation hold, investigation, or audit is underway, relevant data must not be deleted or altered until authorized.

25.0.8.2 All exceptions must be documented and approved by Legal Counsel and the Information Security Officer.

25.0.9 Compliance

25.0.9.1 Non-compliance with this policy may result in disciplinary action, up to and including termination.

25.0.9.2 Regulatory penalties may apply for failure to properly retain or dispose of data.

25.0.10 Review and Updates

25.0.10.1 This policy must be reviewed annually or after significant regulatory changes.

25.0.10.2 Updates will be communicated to all employees and relevant stakeholders

Certificate of Review

Data Retention Policy

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Name	Job title	Stakeholder type	Action	Timestamp
Mark Gutman		Policy Owner	Submitted	Friday, November 21, 2025 3:23 PM EST
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