# Blackbaud's Retention of Customer Data

## Overview

Blackbaud stores Customer Data (defined below) to provide its solutions and services to customers and as required by applicable law or regulation or for Other Legitimate Business Purposes (as defined below). Generally, when a customer cancels its contract for a particular solution, Customer Data in that solution's database is removed from our infrastructure within 3 months. Associated backups of that Customer Data are automatically purged within 3 months thereafter for most of our solutions. We retain some Customer Data longer as required by law or regulation, in connection with legal actions, to comply with commitments to our financial partners, and for other Legitimate Business Purposes. For more detail and some exceptions to this summary, please see below.

#### What's Customer Data?

Blackbaud maintains protocols and standards to help protect Customer Data, meaning information from or about an individual constituent stored by Blackbaud's customers within Blackbaud's product databases. Customer Data does not include aggregated or anonymized data or data about a customer, like current or prospective customer contact information held in our internal customer management system.

# Why do we maintain and retain Customer Data?

Blackbaud only collects, processes, and stores Customer Data that is necessary to fulfill contractual obligations with customers, as required by law or regulation or for Blackbaud's Other Legitimate Business Purposes.

Blackbaud maintains Customer Data that it needs to provide its solutions and services for the life of the customer's contract for that particular solution or service. During the life of the contract and, in some instances, even after cancellation of a solution or service, Blackbaud may retain Customer Data for other legitimate business purposes that are inherent in providing our solutions and services, like complying with applicable payment regulations, financial reporting obligations, and legal actions (all such activities collectively referred to as "Other Legitimate Business Purposes"). You can read more about how long we retain Customer Data for Other Legitimate Business Purposes below.



# How long do we retain Customer Data stored in our solutions?

#### BLACKBAUD'S GENERAL POLICY

There are two use cases: (i) when a contract expires and the customer is no longer a Blackbaud customer; or (ii) when a customer cancels the use of a solution or service but uses other Blackbaud solution(s). In the first case, once a contract expires, Blackbaud removes the relevant Customer Data from our infrastructure within 3 months, except for Blackbaud's educational and award management solutions, as noted below. Backups of that Customer Data held offsite "age" out approximately 3 months after that, subject to some variation by solution.

In the second case, Customer Data, with respect to the solution that the customer cancels, is decommissioned/removed from applicable infrastructure within 3 months from contract termination, except for Blackbaud's educational and award management solutions as well as solutions with data dependencies.

Following this process, associated backups of that Customer Data are retained offsite before being automatically purged—within 3 months for most solutions.

### BLACKBAUD'S EDUCATIONAL AND AWARD MANAGEMENT SOLUTIONS

These solutions, listed below, retain certain Customer Data past contract expiration to allow for customers to collect debts and for tax reporting purposes and/or for individuals using those solutions to complete their activities and continue to leverage their data submitted to multiple customers. As such:

- Blackbaud Award and Stewardship will delete application data within 5 years of the last application submission date.
- Blackbaud Financial Aid Management will delete application supplemental documents within 12 months of the last application submission date and delete all self-reported applicant data within 24 months of the last application submission date.
- Blackbaud Tuition Management will delete Customer Data within 24 months following the last school session end date relevant to the customer's contract.

# BLACKBAUD SOLUTIONS WITH DATA DEPENDENCIES

Typically, as explained above, cancellation of a solution triggers decommissioning and deletion of Customer Data stored therein. These solutions, listed below, retain certain Customer Data past contract expiration to allow for interoperability between solutions that customers are still using:

For Blackbaud Education Management, access to Customer Data in any of the

following sub-module solutions will be removed but not deleted as long as the customer still contracts for any other sub-module: School Website Solution, Enrollment Management System, Student Information System, and Learning Management System. Upon cancellation of all Blackbaud Education Management solutions, Customer Data with respect to that solution is decommissioned/removed from applicable infrastructure within 3 months from contract termination and backups of that Customer Data will be purged within 6 months thereafter.

- If a customer cancels all sub-module solutions in Blackbaud Education Management, Customer Data in Blackbaud Billing Management will be deleted.
- For customers using YourCause CSRConnect and GrantsConnect, Customer Data in CSRConnect will not be deleted until both solutions are cancelled.
- For TeamRaiser with GoodMove, upon cancellation of TeamRaiser, Customer Data stored in GoodMove will also be decommissioned and deleted in accordance with the following schedule: decommissioned/removed from applicable infrastructure within 3 months from contract termination and backups of that Customer Data will be purged within 6 months thereafter.

# How long do we retain Customer Data used in connection with services & support?

Typically, after a service is performed, unless a Customer requests an extension Customer Data with respect to that service is deleted within 6 months. Customer Data used for support purposes is deleted within 3 months of case closure.

### **DATA & ANALYTICS SERVICES**

Upon delivery of a data or analytics service, Customer Data with respect to that service is deleted within 6 months. Exceptions to this process include the following for which Blackbaud will decommission the Customer Data within:

- 10 days from service delivery: Grateful Patient Solution daily screenings files
- 12 months from service delivery: Consulting materials (ex: PPT and PDF)
- 24 months from service delivery: donorCentrics Overall Program Assessment (OPA) Reports and Comp Benchmarking Comparison Group Books.

### PROFESSIONAL, TECHNICAL, AND MANAGED SERVICES

Upon delivery of a professional, technical, or managed service, Customer Data with respect to that service is deleted within 6 months.

Solution migrations are an exception to this process. Decommissioning for Customer Data being migrated to a new Blackbaud solution may be retained for up to 12 months to allow

for the migration to be completed.

#### CUSTOMER SUPPORT

Upon delivery of Customer Support case closure\resolution, all Customer Data attached to or associated with the case will be deleted within 3 months from closure of the support case.

# How long do we retain Customer Data for Other Legitimate Business Purposes?

Depending on the nature of the solution or service Blackbaud is providing, we may be required by various laws and regulations (e.g. financial services regulations, direct marketing laws, HIPAA etc.), legal activities, contract and/or regulatory requirements, or reporting obligations to retain information related to the provision our services for a certain time, during which relevant Customer Data may not be deleted. In all cases where Customer Data is retained, it is done in accordance with any limitation periods and records retention obligations that are imposed by the above-mentioned instances. Such Customer Data shall be deleted once the retention period has ended and we have no other legal reason to keep it longer.

Other Legitimate Business Purpose	When will relevant Customer Data be deleted?
To comply with legal and regulatory obligations or investigatory requests	After the expiration of the applicable legal/regulatory retention period
To assist with fraud monitoring, detection, and prevention activities	After termination of the contract for the applicable solution/service, unless a legal/regulatory retention requirement applies
To comply with tax, accounting, human resources, and financial reporting obligations	After the expiration of the applicable retention period
To comply with contractual commitments to financial partners, and where data retention is mandated by the payment method(s) utilized by the customer.	After the expiration of the applicable retention period
To take action or defend actual, threatened, contemplated, or pending legal proceedings	After the General Counsel determines the data is no longer needed

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To notify an insurer of a claim	After the insurer agrees the data need not be maintained
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