

# DATA RETENTION POLICY

**Upling, LLC**

*Effective Date: May 2026*

*Last Reviewed: May 2026*

## 1. Purpose and Scope

This Data Retention Policy ("Policy") establishes the periods for which Upling, LLC ("Upling") retains personal data collected through the Upling App and the Bud-E feature, and the procedures for securely deleting that data when retention periods expire.

This Policy applies to all personal data collected from users, including health and preference data, genetic information, purchase and transaction records, and account data. It applies to data stored on Upling's own systems and data stored on behalf of Upling by Amazon Web Services (AWS).

This Policy is incorporated by reference into the Bud-E Terms of Service and the Upling general Terms of Service.

## 2. Retention Schedule by Data Category

Data Category	Retention Period
<b>Genetic data (DNA swab results, endocannabinoid marker analysis)</b>	Duration of active account; deleted within 30 days of account deletion or verified deletion request
<b>Bud-E chat query history and reported symptoms or conditions</b>	Duration of active account; deleted within 30 days of account deletion
<b>Product preferences and strain feedback</b>	Duration of active account; deleted within 30 days of account deletion
<b>Age and identity verification data (driver's license scan)</b>	3 years from date of verification
<b>Account registration data (name, email, contact information)</b>	Duration of active account; deleted within 30 days of account deletion
<b>Order and delivery records (individual order details, delivery address)</b>	5 years from date of transaction
<b>Payment and transaction records</b>	7 years from date of transaction
<b>AI model training data (aggregated, de-identified)</b>	Indefinite, as part of Upling's proprietary AI model

### 3. Account Deletion

When a user deletes their Upling account, Upling will delete or anonymize all personal data in the categories marked "Duration of active account" in the retention schedule above within 30 days of the account deletion request being verified.

The following data is not deleted upon account deletion and is retained for the periods specified in the schedule above:

- Payment and transaction records (7 years)
- Order and delivery records (5 years)
- Age and identity verification records (3 years)
- De-identified and aggregated AI model training data (indefinite)

Users will be notified at the time of account deletion of what data is retained and for how long.

### 4. Genetic Data Deletion

Users may request deletion of their genetic data independently of account deletion at any time by contacting Upling at [support@uplingapp.com](mailto:support@uplingapp.com). Upling will process verified genetic data deletion requests within 30 days and will direct IndyGeneus Bio to delete any retained sample or result data within the same period.

Deletion of genetic data does not require account deletion and will not affect the user's access to other Upling services.

### 5. Data Stored on AWS

Data stored within Upling's AWS environment is subject to the same retention periods set out in this Policy. Upling retains full ownership of all data stored on AWS. Upon account deletion or expiration of a retention period, Upling will delete the relevant data from its AWS environment. AWS does not retain copies of Upling user data beyond what is required to provide the contracted infrastructure services.

### 6. Third-Party Data Processors

Upling works with the following third-party processors who may hold user data as part of their contracted services:

Processor	Data Held
IndyGeneus Bio	DNA swab samples and genetic analysis results
Upling's cannabis banking partner	Payment transaction records
Amazon Web Services (AWS)	All app and Bud-E user data (as cloud infrastructure provider)

## **7. Security During Retention**

During all retention periods, Upling applies the following safeguards to stored personal data:

- Encryption at rest and in transit within AWS infrastructure
- Access controls limiting data access to authorized Upling personnel on a need-to-know basis
- HIPAA-compliant and HITRUST-certified AWS storage environment
- Genetic data stored separately from other personal data categories

In the event of a data breach affecting retained personal data, Upling will comply with applicable breach notification requirements under Maryland law (Md. Code, Com. Law Section 14-3501 et seq.) and D.C. law.

## **8. Policy Review**

This Policy will be reviewed at least annually and updated as needed to reflect changes in Upling's data practices, applicable law, or regulatory guidance. Material updates to this Policy will be communicated to users through the App or by email with 30 days advance notice.

Questions about this Policy should be directed to [support@uplingapp.com](mailto:support@uplingapp.com).