

HO3 Data Retention and Deletion Policy

Effective Date: April 11, 2026 | Last Reviewed: April 11, 2026

1. Scope

HO3 is a private personal finance application used exclusively by two authorized users (the account owner and spouse). This policy governs the retention and deletion of all consumer financial data collected, processed, or stored by the application, including data retrieved through the Plaid API.

2. Data Retained

HO3 retains the following categories of data: account balances and transaction history retrieved from connected financial institutions via Plaid; liability details including credit card and loan balances, APRs, and minimum payments; user-provided categorizations, notes, and uploaded receipt or statement images; encrypted Plaid access tokens required to maintain bank connections; and account profile information including email and authentication credentials.

3. Retention Period

Financial data is retained for as long as the user maintains an active HO3 account. Active accounts retain transaction history for analytical and budgeting purposes. No data is sold, shared, or transferred to any third party.

4. Deletion Upon Request

Users may request deletion of their account and all associated data at any time. Upon a deletion request: (a) Plaid access tokens are immediately revoked, terminating all bank connections; (b) all user data, including transactions, balances, liabilities, receipts, and uploaded statements, is permanently removed from the active database within 30 days; (c) backup copies are retained for an additional 30-day rolling window for disaster recovery purposes, after which they are permanently purged.

5. Automatic Deletion

Inactive accounts (no login for 24 consecutive months) are flagged for automatic deletion. The account holder receives notice 30 days prior to deletion and may reactivate by logging in. Failure to reactivate results in permanent data removal following the same procedure as a manual deletion request.

6. Compliance

This policy is designed to comply with applicable U.S. data privacy laws, including the principles of the California Consumer Privacy Act (CCPA) and Gramm-Leach-Bliley Act (GLBA) safeguards rules. As a private two-user application, HO3 does not sell consumer data, does not share data with advertisers, and does not engage in any processing activity that would trigger additional regulatory obligations.

7. Periodic Review

This policy is reviewed at least annually by the account owner. Reviews verify that retention periods remain appropriate, that deletion procedures function as documented, and that the policy reflects current applicable law. The most recent review date is recorded at the top of this document.

8. Contact

Requests related to this policy, including data deletion requests, may be directed to the account owner via the contact email associated with the HO3 account.