

Data Governance & Retention Policy

How MortarCAPS governs, retains and disposes of data

Organisation	MortarCAPS Higher Learning Data Standard Ltd (ACN 684 569 864)
Registered address	368 Sussex Street, Sydney, NSW 2000, Australia
Policy owner	Gemma Williams, Head of Operations
Approved by	Board of Directors
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1. Purpose

To ensure data held by MortarCAPS is governed, secured, retained and disposed of appropriately, across all jurisdictions in which we operate.

2. Scope

All personal, institutional and operational data held by MortarCAPS, including data relating to the Human Capability Record (HCR).

3. Principles

- Collect only what is necessary.
- Use data only for stated purposes.
- Keep data accurate, secure and no longer than needed.
- Respect learner ownership and consent for HCR data.

4. Data classification

- Public — publishable material.
- Internal — operational data.
- Confidential — partner and commercial data.
- Sensitive / Personal — personal information, including any HCR learner data.

5. Roles

The Head of Operations is the data governance owner; the Board holds oversight. Service providers are bound by equivalent obligations.

6. Retention schedule

- Enquiry / contact data — 2 years after last contact.
- Partner / licence records — 7 years after end of agreement.
- Financial records — 7 years.
- HCR learner data — per learner consent and applicable law; deleted on withdrawal, subject to legal holds.

7. Access control

Access is granted on a least-privilege, need-to-know basis and reviewed periodically.

8. Cross-border transfers

Transfers to, or access from, overseas (including service providers, and operations in New Zealand and Canada) are assessed against Australian Privacy Principle 8 and the relevant overseas laws before proceeding.

9. Disposal

Data is securely deleted or de-identified at the end of its retention period.

10. Review

Reviewed annually or on material change.