



**Document: Data Retention and Erasure Policy &
Schedule**

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Introduction

Data Retention Approach

The purpose of this policy is to ensure that necessary data, records and documents of Intelligent Ocean Ltd are adequately protected and maintained. Also, to ensure that records that are no longer needed or are of no value are discarded at the proper time and in the proper fashion. This policy is also for the purpose of aiding employees of Intelligent Ocean Ltd in understanding their obligations in retaining data or electronic documents including email, web files, text files, sound and video files, PDF documents and all Microsoft Office or other formatted files.

In summary, personal data will be retained for no longer than is necessary. A Data Retention Schedule will be produced by Intelligent Ocean Ltd to demonstrate a generic retention period based on the purpose of the data and data retention guidelines. In the event that the retention of personal data is no longer necessary for the operation of Intelligent Ocean Ltd, the data shall be deleted and all copies shall be destroyed as per the defined schedule.

Administration

The following Record Retention Schedule is the initial maintenance, retention and disposal schedule for records held by Intelligent Ocean Ltd. This schedule should be reviewed regularly to ensure the data retention policy approach is adhered to.

There are certain occasions when information needs to be preserved beyond any limits set out in the policy. The policy must be SUSPENDED relating to a specific customer or document and the information retained beyond the period specified in this Data Retention Schedule in the following circumstances:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened or actual
- A crime is suspected or detected
- Information is relevant to a company in liquidation, receivership or where a debt is due to the company
- Information is considered by the owning unit to be of potential historical importance

In the case of possible or actual legal proceedings, investigations or crimes occurring, the type of information that needs to be retained relates to any that will help or harm the company or the other side's case, liability or amount involved. If there is any doubt over whether legal proceedings, an investigation or a crime could occur or what information material is relevant in these circumstances, the company shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Record Retention Schedule

The data retention policy is based on the following schedule.

Department	Function
A	Accounting and finance
B	Contracts
C	Corporate records
D	Correspondence and internal memoranda
E	Personal information
F	Electronic records
G	Insurance records
H	Legal
I	Miscellaneous
J	Personnel records
K	Tax records
L	Operational Records

A. Accounting And Finance

Record Type	Retention Period
Annual audit reports and financial statements	Permanent
Annual audit records, including work papers and other documents that relate to the audit	7 years after completion of an audit
Annual plans and budgets	2 years
Bank statements and cancelled cheques	7 years
Employee expense reports	7 years
Interim financial statements	7 years
Credit card records (documents showing customer credit card number)	2 years

All records showing customer bank details must be locked in a desk drawer or a filing cabinet when not in immediate use by staff. If it is determined that information on a document, which contains credit card information, is necessary for retention beyond 2 years, then the identifying details will be cut out of the document.

B. Contracts

Record type	Retention Period
Contracts and related correspondence (including any proposal that resulted in the contract and all other supporting documentation)	7 years after expiration or termination

C. Corporate Records

Record type	Retention Period
Corporate records (minutes, signed minutes of the board and all committees, record of incorporation, articles of incorporation, annual corporate reports)	Permanent
Licenses and permits	Permanent

D. Correspondence And Internal Memoranda

General principle: most correspondence and internal memoranda should be retained for the same period as the document to which they relate. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

Category 1

Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years. Some examples include:

- Routine letters and notes that require no acknowledgement or follow up, such as notes of appreciation, congratulations, letters of transmittal and plans for meetings
- Form letters that require no follow up
- Letters of general inquiry and replies that complete a cycle of correspondence
- Letters or complaints requesting specific action that have no further value after changes are made or action is taken (such as name or address change)
- Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary
- Chronological correspondence files

Copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed; unless that information provides a reference to, or direction to other documents and must be kept for project traceability.

Category 2

Those pertaining to non-routine matters or having significant lasting consequences should generally be permanently retained.

E. Retaining Personal Information

This section sets out the data retention policies and procedures that are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information.

Personal information that is processed for any purpose(s) shall not be kept for longer than is necessary for that purpose or those purposes. We will usually delete personal data falling within the categories set out below at the date/time set out below:

Record type	Retention period
Information about a computer, including visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	2 years following account closure
Information provided when registering with our website (including email address)	2 years following account closure
Information provided when completing a profile on our website (including a name, gender, date of birth, interests and hobbies, educational details)	2 years following account closure
Information provided for the purpose of subscribing to email notifications and/or newsletters (including a name and email address)	Indefinitely or until the client chooses to 'unsubscribe'
Information provided when using the services on the website or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)	Indefinitely
Information relating to any subscriptions made (including name, address, telephone number, email address and card details)	2 years following account closure
Information posted to our website for publication on the internet	2 years after post
Information contained in or relating to any communications sent through the website (including the communication content and metadata associated with the communication)	2 years following contact
Any other personal information chosen to be sent	2 years following contact

Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing personal data:

- To the extent that we are required to do so by law;
- If we believe that the documents may be relevant to any ongoing or prospective legal proceedings;
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)

We will run database backups of all electronic data contained on our servers. This backup will include all information relating to all current users, as well as any information that remains on the server due to any

reason contained in this policy. This database backup is a safeguard to retrieve lost information within a one year retrieval period should system users experience any problems.

F. Electronic Documents

Electronic Mail

Not all email needs to be retained, it depends on the subject matter.

- All emails from internal or external sources are to be deleted after 12 months
- Staff will strive to keep all but an insignificant minority of their emails related to business issues
- We will archive emails for up to six months after they have been deleted by staff, after which time the email will be permanently deleted
- Staff will take care not to send confidential/proprietary information to outside sources

Electronic Documents

Including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.

- **PDF documents:** The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy. The maximum period that a PDF file should be retained is 6 years. PDF files the employee deems vital to the performance of his or her job should be printed and stored in the employee's workspace. One exception to this are Intelligent Ocean's training certificates which are stored as PDFs which are kept indefinitely due to the need for verification purposes (See Section L).
- **Text/formatted files:** Staff will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated. After five years, all text files will be deleted from the network and the staff's desktop/laptop. Text/formatted files the staff deems vital to the performance of their job should be printed and stored in the staff's workspace

We do not automatically delete electronic files beyond the dates specified in this policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy. In certain cases, a document will be maintained in both paper and electronic form. In such cases, the official document will be the electronic document.

G. Insurance Records

Record Type	Retention Period
Certificates	Permanent
Claims files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance policies (including expired policies)	Permanent

H. Legal Files And Papers

Record Type	Retention Period
Legal memoranda and opinions (including all subject matter files)	7 years after close of matter
Litigation files	1 year after expiration of appeals or time for filing appeals
Court orders	permanent
Requests for departure from records retention plan	10 years
Register of members	Permanent
Minutes of directors' meetings	10 years

I. Miscellaneous

Record Type	Retention Period
Consultant's reports	2 years or indefinite if the report has a legal obligation.
Material of historical value (including pictures, publications)	Permanent
Policy and procedures manuals – original	Current version with revision history
Policy and procedures manuals copies	Retain current version only
Annual reports	Permanent
Record of person's I.D for money laundering purposes	5 years
Any work related reportable accident, injury or death	3 years from the report
Immigration checks	2 years from the termination of a job

J. Personnel Records

Record Type	Retention Period
Job applications/interviews of unsuccessful candidates	6 months or less (longer with explicit consent)
Employee personnel records (including individual attendance records, annual leave, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employment contracts – individual	7 years after separation
Employment records-correspondence with employment agencies and advertisements for job openings	3 years from the date of hiring decision
Job descriptions	3 years after superseded
Working time opt-out forms	2 years
Current bank details of employees	Only as long as necessary

Note: Application forms should give the opportunity for subjects to object to their details being retained/processed.

K. Tax Records

General Principle: Companies must keep books of account or records as are sufficient to establish the amount of gross income, deductions, credits or other matters required to be shown in any such return. These documents and records shall be kept for as long as the contents thereof may become material in the administration of tax laws.

Record Type	Retention Period
Tax-exemption documents and related correspondence	Permanent
Tax bills, receipts, statements	7 years
Tax returns	Permanent
Sales/use of tax records	7 years
Annual information returns	Permanent
Payroll/wage records for unincorporated businesses	5 years after 31 Jan following the year of assessment
PAYE records	3 years (minimum) from the end of the tax year to which they relate
Maternity records	3 years after the end of the tax year in which the maternity pay period ends

L. Operational Records

Record Type	Retention Period
Client records (Name, address, email and other contact information)	7 years
Supplier records (Name, address, email and other contact information)	7 years
Employee records (Name, address, payroll and other employment information as required)	7 years
Customer Records (Name, address, email and other contact information)	7 years after last correspondence unless the customer opts out?
Tracking information from our website, social media, and other online sites.	Indefinitely
Training Certificates (Name, Date of Training and Unique certificate number)	Indefinitely – as certificates are often legal requirements for employment we need to keep these PDF documents on record for verification purposes
Other operational records as required to provide our services and meet our commitments to you.	As required to meet our obligations to you, provide our services, and develop and to run our business.

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