

DATA RETENTION POLICY

Purpose

The purpose of this Policy is to ensure that necessary records and documents of Lyndhurst Precision Engineering Limited are adequately protected and maintained and to ensure that records that are no longer needed by Lyndhurst Precision Engineering Limited or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding employees of Lyndhurst Precision Engineering Limited in understanding their obligations in retaining electronic documents - including e-mail, Web files, text files, sound and video files, PDF documents, and all Microsoft Office or other formatted files.

Policy

This Policy represents Lyndhurst Precision Engineering Limited's policy regarding the retention and disposal of records and the retention and disposal of electronic documents.

Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Lyndhurst Precision Engineering Limited and the retention and disposal of electronic documents. The Operational Director of Lyndhurst Precision Engineering Limited (the "Administrator") is the Director in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is also authorised to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with National legislation and includes the appropriate document and record categories for Lyndhurst Precision Engineering Limited monitor legislation affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

In addition, any retained information can only be used for the purpose for which it is stored. This is compliant with the Data Protection Act 1998.

Suspension of Record Disposal in Event of Legal Proceedings or Claims

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 the Lyndhurst Precision Engineering Limited's 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 or receivership, where a debt is due to Lyndhurst Precision Engineering Limited.

-Information is considered by the owning unit to be of potential historical importance and this has been confirmed by the Administrator.

-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 Lyndhurst Precision Engineering Limited or the other side's case or liability or amount involved.

-If there is any doubt over whether legal proceedings, an investigation or a crime could occur, or what information is relevant or material in these circumstances, the Administrator should be contacted and legal advice sought.

-The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Security of personal information

Lyndhurst Precision Engineering Limited will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Lyndhurst Precision Engineering Limited will store all personal information on our secure (password- and firewall-protected) servers.

All electronic financial transactions entered into through our website will be protected by encryption technology.

The Client should acknowledge that the transmission of information over the internet is inherently insecure, and that Lyndhurst Precision Engineering Limited cannot guarantee the security of data sent over the internet.

Amendments

Lyndhurst Precision Engineering Limited may update this policy from time to time by publishing a new version.

This page should be checked occasionally to ensure that the policy remains relevant.

Applicability

This Policy applies to all physical records generated in the course of Lyndhurst Precision Engineering Limited's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

This Policy was Originally approved by the Managing Director of Lyndhurst Precision Engineering Limited on May 8th 2018.

APPENDIX A RECORD RETENTION SCHEDULE

The Record Retention Schedule is organised as follows:

SECTION TOPIC

- A. Accounting and Finance
- B. Contracts
- C. Corporate Records
- D. Correspondence and Internal Memoranda
- E. Personal Information
- F. Electronic Records
- G. Grant Records
- H. Insurance Records
- I. Legal
- J. Miscellaneous
- K. Personnel Records
- L. Tax Records
- M. Fiscal Sponsor Project 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 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

Credit card record retention and destruction

A credit card may be used to pay for the following Lyndhurst Precision Engineering Limited products and services:

All records showing customer bank details must be locked in a desk drawer or a file 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 credit card number 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 supportive documentation)	7 years after expiration or termination

C. CORPORATE RECORDS

<u>Record Type</u>	<u>Retention Period</u>
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 pertain or support. 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:

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 acknowledgment 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 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.

Please note that 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 reference to or direction to other documents and must be kept for project traceability.

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

E. Retaining personal information

1. This Section sets out the data retention policies and procedure of Lyndhurst Precision Engineering Limited which are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information.

2. Personal information that is processed by Lyndhurst Precision Engineering Limited for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to point 2 (above) Lyndhurst Precision Engineering Limited 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 and about 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 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'

<u>Record Type</u>	<u>Retention Period</u>
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 meta data 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, Lyndhurst Precision Engineering Limited will retain documents (including electronic documents) containing personal data:

- (a) to the extent that Lyndhurst Precision Engineering Limited is required to do so by law;
- (b) If Lyndhurst Precision Engineering Limited believes that the documents may be relevant to any ongoing or prospective legal proceedings;
- (c) and in order to establish, exercise or defend Lyndhurst Precision Engineering Limited's legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

Each day Lyndhurst Precision Engineering Limited will run a database backup copy of all electronic data contained on the Lyndhurst Precision Engineering Limited 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 users on the Lyndhurst Precision Engineering Limited system experience any problems. All data backups are stored in a separate location for a time period of 14 days prior to the backup initially being stored.

F. ELECTRONIC DOCUMENTS

1. Electronic Mail: Not all email needs to be retained, depending on the subject matter.
All e-mail—from internal or external sources—is to be deleted after 12 months.

Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.

Lyndhurst Precision Engineering Limited will archive e-mail for six months after the staff has deleted it, after which time the e-mail will be permanently deleted. Staff will take care not to send confidential/proprietary Lyndhurst Precision Engineering Limited information to outside sources.

Any e-mail staff deems vital to the performance of their job should be copied to the staff's H: drive folder, and printed and stored in the employee's workspace.

2. 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.

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.

Lyndhurst Precision Engineering Limited does 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. GRANT RECORDS

Record Type	Retention Period
Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period

Documentation relating to grantee evidence of invoices and matching or challenge grants that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	7 years after completion of grant period
Grantee work product produced with the grant funds	7 years after completion of grant period

H. INSURANCE RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Certificates Issued to Lyndhurst Precision Engineering Limited	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance Policies (including expired policies)	Permanent

I. LEGAL FILES AND PAPERS

<u>Record Type</u>	<u>Retention Period</u>
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

J. MISCELLANEOUS

<u>Record Type</u>	<u>Retention Period</u>
Consultant's Reports	2 years
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

K. PERSONNEL RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation

<u>Record Type</u>	<u>Retention Period</u>
Employment Contracts – Individual	7 years after separation
Employment Records Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Job Descriptions	3 years after superseded

L. TAX RECORDS

General Principle:

Donors Forum must keep books of account or records as are sufficient to establish 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 federal, state, and local income, franchise, and property tax laws.

<u>Record Type</u>	<u>Retention Period</u>
Tax-Exemption Documents and Related Correspondence	Permanent
Tax Bills, Receipts, Statements	7 years
Tax Returns	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns	Permanent

M. FISCAL SPONSOR PROJECT RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Sponsorship agreements	Permanent

.....*M. Main*.....Managing Director

Date...*14-3-24*.....