

# **DATA RETENTION POLICY**

[Company Name] seeks to ensure that it retains only data necessary to effectively conduct its program activities and work in fulfillment of its mission.

The need to retain data varies widely with the type of data and the purpose for which it was collected. [COMPANY NAME] strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required. This policy sets forth [COMPANY NAME]'s guidelines on data retention and is to be consistently applied throughout the organization.

## **Scope**

This policy covers all data collected by [COMPANY NAME] and stored on [COMPANY NAME] owned or leased systems and media, regardless of location. It applies to both data collected and held electronically (including photographs, video and audio recordings) and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by federal or local law, federal regulations and legitimate business purposes, as well as the EU General Data Protection Regulation (GDPR).

## **Reasons for Data Retention**

[COMPANY NAME] retains only that data that is necessary to effectively conduct its program activities, fulfill its mission and comply with applicable laws and regulations.

Reasons for data retention include:

- Providing an ongoing service to the data subject (e.g. sending a newsletter, publication or ongoing program updates to an individual, ongoing training or participation in [COMPANY NAME]'s programs, processing of employee payroll and other benefits)
- Compliance with applicable laws and regulations associated with financial and programmatic reporting by [COMPANY NAME] to its funding agencies and other donors
- Compliance with applicable labor, tax and immigration laws
- Other regulatory requirements
- Security incident or other investigation
- Intellectual property preservation
- Litigation

## **Data Duplication**

[COMPANY NAME] seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other business reasons it is necessary for data to be held in more than one place. This policy applies to all data in [COMPANY NAME]'s possession, including duplicate copies of data.

## **Retention Requirements**

[COMPANY NAME] has set the following guidelines for retaining all personal data as defined in the Institute's data privacy policy.

- Website visitor data will be retained as long as necessary to provide the service requested/initiated through the [COMPANY NAME] website.
- Contributor data will be retained for the year in which the individual has contributed and then for [Duration] after the date of the last contribution. Financial information will not be retained longer than is necessary to process a single transaction.
- Event participant data will be retained for the period of the event, including any follow up activities, such as the distribution of reports, plus a period of [Duration];
- Program participant data (including sign in sheets) will be retained for the duration of the grant agreement that financed the program plus any additional time required under the terms of the grant agreement.
- Personal data of subgrantees, subcontractors and vendors will be kept for the duration of the contract or agreement.
- Employee data will be held for the duration of employment and then [Duration] after the last day of employment.
- Data associated with employee wages, leave and pension shall be held for the period of employment plus [Duration], with the exception of pension eligibility and retirement beneficiary data which shall be kept for [Duration].
- Recruitment data, including interview notes of unsuccessful applicants, will be held for [Duration] after the closing of the position recruitment process.
- Consultant (both paid and pro bono) data will be held for the duration of the consulting contract plus [Duration] after the end of the consultancy.
- Board member data will be held for the duration of service on the Board plus for [Duration] after the end of the member's term.
- Data associated with tax payments (including payroll, corporate and VAT) will be held for [Duration].
- Operational data related to program proposals, reporting and program management will be held for the period required by the [COMPANY NAME] donor, but not more than [Duration].

### **Data Destruction**

Data destruction ensures that [COMPANY NAME] manages the data it controls and processes it in an efficient and responsible manner. When the retention period for the data as outlined above expires, [COMPANY NAME] will actively destroy the data covered by this policy. If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, he or she should identify this data to his/her supervisor and provide information as to why the data should not be destroyed. Any exceptions to this data retention policy must be approved by [COMPANY NAME]'s data protection officer in consultation with legal counsel. In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.