

Data Retention and Destruction Policy

Approved by: Executive Team

Version #: V01

This document provides guidelines for the retention and destruction of data by employees Healthcare Platform Institute (HPI). Each employee is responsible for reviewing the elements of the policy below. The employee's signature is required to confirm the reading of the organization's policy.

1. Purpose

The purpose of this Data Retention and Destruction Policy is to ensure that HPI maintains its official records in accordance with the requirements of all applicable laws, required terms and condition by the grantors, and that official records no longer required by HPI are disposed of in a timely manner. This policy provides guidelines for the retention of official documents in ordinary circumstances. It is also for the purpose of aiding employees of HPI in understanding their obligations in retaining electronic documents, including emails, text files, sound and movie files, PDF documents and all Office Suite or other formatted files.

2. Policy

This policy represents HPI's policy regarding the retention and disposal of records and the retention and disposal of electronic documents. The intent of this policy is that records should be retained only as long as necessary to meet legislative, contractual, administrative, and operational requirements. Staff, and service providers must ensure that documents for which they are responsible are accurate, complete, and are retained for the periods of time indicated in the policy, and then disposed of in accordance with the policy.

Documents must be managed and disposed of in a manner appropriate to the sensitivity of the information they contain. Therefore, it is the responsibility of the employees to ensure that Healthcare HPI's information classification standard is met when maintaining and disposing of records. When a document is destroyed (as defined in the policy below), care must be taken to ensure that all personal and confidential information contained therein is permanently and securely destroyed.

3. Covered Records

This policy applies to all official records generated in the courses of the HPI's operations, including but not limited to:

- Typed or printed hardcopy (papers) documents;
- Electronic records and documents (email, text files, PDF files);
- Video or digital images;
- Electronically stored information contained on network servers and/or document management system;

4. Applicability

This policy applies to all physical records generated in the course of HPI's operation, including both original documents and verified reproductions. It also applies to the electronic documents described above.

5. Record Storage Procedures

- a) In order to facilitate the administration of this policy, where possible, the official records of HPI should be organized and maintained in general categories to facilitate the efficient administration of the organization's activities. Consequently, documents in each category should generally be organized and stored in chronological order or by period (e. g., month or year).
- b) Categories of documents that do not need to be permanently retained should be maintained by date or conspicuously dated to enable such records to be easily identified for destruction at the end of the record retention period.

6. Responsibility for Retention

Unless otherwise by other policies or regulation of the institute, records must be retained by the department in which they were received or created.

7. Records In Electronic Systems

Where Records are created in an electronic system utilized by multiple departments, the department responsible for control and maintenance of the electronic system is required to retain the Records contained in the electronic system.

8. DESTRUCTION OF RECORDS

Files that have been retained for the period specified in the record retention schedule below should be destroyed promptly at the end of that period. Before an official document is destroyed, written approval must be given by the executive team. Paper documents must be destroyed with the shredder. Digital documents must be placed in the desktop trash and the trash must be emptied. As for emails, the information technology department must ensure that it takes care of the destruction of emails when their retention period has expired.

Where the destruction has been carried out by third parties, written verification of this destruction must be obtained from the third party. A written verification should be kept for any document destruction.

9. Record Retention Schedule

The table below provides an indication for the retention period by document type.

Type of Record	Retention Period
All Email (Internal & External source)	7 years
Credit Card Records (Customers)	2 years
Routine Letter/ Letter of General Inquiry/Letter of Complaint	5 years
PDF Files	10 years
Text/Formatted Files/Excel	10 years
Employee Medical Records	6 years
Employee Personnel Records	6 years
Accounts Payable and Receivable Ledgers and Schedules	7 years
Annual Audit Records	10 years
Approved Budgets	7 years
Bank Reconciliations	7 years
Bank Statements / Cancelled Cheques	7 years
Contracts	10 years after termination
Employment Contracts	10 years after termination
Financial Statement Working Papers	7 years
Invoices / Receipts of Payment	7 years
Legal Memoranda & Opinion	10 years after the file
Original Grant Proposal	10 years after the grant
Payroll Records	7 years
Correspondence and Internal Memoranda	Same period as the document they support
Annual Reports	Permanent
Court Orders	Permanent
Employment Applications	Permanent
General Ledger	Permanent
Governing Documents (Letters Patent, Certificate of Incorporation, Bylaws)	Permanent
Minutes of Directors' Meetings	Permanent
Minutes of Executive Team Meetings	Permanent
Licenses and Permits	Permanent
Year End Financial Statements	Permanent
Performance Reviews	Permanent

Type of Record	Retention Period
Personnel Information (Sick Leave, Time Sheets, Attendance, Discipline, Vacation)	Permanent

10. Confidentiality and Ownership

All records are the property of HPI, and employees are expected to hold all organization records in confidence and to treat them as the HPI assets. Records must be safeguarded and may be disclosed to parties outside of the HPI only upon proper authorization. Any subpoena, court order or other request for documents received by employees, or questions regarding the release of the HPI's records, must be directed to the President of HPI prior to the release of such records. Any records of the HPI in possession of an employee must be returned to the employee's supervisor or line manager upon termination of employment.

This policy is not intended to and does not constitute or create contractual terms of employment, assure specific treatment under specific conditions, and/or does not alter the at-will nature of any employment relationship with HPI.

Employee Agreement on Data Retention and Destruction Policy

I have read, understood, and agreed to comply with the foregoing policies, rules, and conditions governing the use of the HPI's data retention and destruction policy. I am aware that violations of this guideline may subject me to disciplinary action, including termination from employment, legal action and criminal liability. Furthermore, I understand that this policy can be amended at any time.

Name:

Signature:

Date: