



### **Records Retention and Destruction Policy**

It is Caminar's policy to retain records for as long as the law or good business practice requires that they be retained. When law or good business practice no longer requires records to be retained, they will be destroyed.

The principal benefits of destroying unnecessary records are two-fold:

- *Cost savings:* Storing records costs money and uses valuable storage capacity. Unnecessary storage of records consumes resources that could be put to a better use.
- *Operating efficiency:* It is easier to find records you need if you do not have to search through a large amount of unnecessary records.

Except where otherwise indicated, this Policy applies equally to physical and electronic records.

### **Destruction Methods**

**Physical Records** that contain confidential information should never be discarded intact, because they may be retrieved after they leave Caminar's control. Instead, these records must be shredded. Materials that do not contain confidential information, such as public documents and unused forms, may be discarded in the trash or, preferably, in recycling bins.

**Electronic Records:** deleting emails or other files on your computer ordinarily does not actually remove them but simply moves them to a "recycle bin" or "trash bin." To permanently delete them, these "bins" must then be emptied.

To ensure that unwanted files are unrecoverable, utilities are available that can "wipe" them from a computer's hard drive by writing over them. If your work involves highly sensitive information, you might consider asking the IT Department about the availability of secure file wiping software.

### **General Retention Requirements**

**Drafts:** Once a document is finalized, all earlier internal drafts should generally be destroyed. However, if a document has been negotiated with another party, any drafts that were exchanged with the other party may be retained if these drafts contain notes or guidance on important issues that could be disputed later.

**Notes:** Your handwritten notes should generally be destroyed after they have served their purpose. However, notes that record facts that may have continuing significance should be retained. For example, your contemporaneous handwritten note recording the time of an event should be retained if it could be used to establish whether a deadline was met.

**Email:** Messages that you receive should generally be retained only as long as they remain pertinent to your work. Every employee with an email account is responsible for periodically reviewing stored email messages and deleting those that are no longer pertinent. However, some email messages have special legal or practical significance and should be retained. For example, an exchange of email messages with a contractor that clarifies a contract ambiguity should be retained for as long as the contract itself is



retained. Similarly, internal messages that could be used as evidence to help resolve a dispute should be retained.

**Computer Network Backups:** All email and electronic files stored on Caminar's servers are routinely backed up in case there is a loss of data or a need to retrieve deleted files.

**Legal Documents:** All records that have legal significance must be retained for as long as they have continuing legal significance and until all relevant statutes of limitations have expired. These time periods will be further discussed in the "Specific Requirements" section of this Policy.

**Investigations, Disputes and Litigation:** Anything that relates to a matter that is under investigation, in dispute, or subject to litigation must be retained and may not be destroyed or altered, even if it would otherwise be destroyed under this Policy. Destruction of any materials in these situations could have severe consequences to Caminar and to the individual employees who are responsible for the destruction. These consequences could include jail time and other criminal and civil penalties. If you are ever unsure whether something is the subject of an investigation, dispute, or litigation, ask your supervisor or Human Resources.

#### **Specific Retention Requirements**

**Employment Records:** Each employee's personnel records should be retained for the time the employee works for the company plus an additional six years. If an employee is exposed to toxic materials, their medical and exposure records must be retained for 30 years.

Resumes and job applications from candidates for an announced job opening must be retained for two years. Unsolicited resumes and applications will be retained for six months.

**Payroll Records:** Each employee's payroll records should be retained for the time the employee works for the company plus an additional four years.

**Charter Documents:** Records that establish or organize any legal entities or evidence their ownership should be retained permanently. Examples include certificates of incorporation, bylaws, partnership agreements, declarations of trust, stock ledgers, and minute books.

**Tax Records:** Tax returns and all supporting documentation should be retained for six years after the filing date, or seven years after the relevant tax year.