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## CGAI Data Retention Policy

### Introduction

This Privacy Statement exists to demonstrate our firm commitment to the privacy of your information and to explain to you our use of your information. The [www.cgai.ie](http://www.cgai.ie) website (the “Website”) is operated by the CGAI. In order to fully understand your rights, we encourage you to read this Privacy Statement.

### Retention Policy

The Data Protection Acts 1988 and 2003 (as amended) (the DPA) and, from the 25th of May 2018, the General Data Protection Regulation (the GDPR) impose obligations on us, as a Data Controller, to process personal data in a fair manner which notifies data subjects of the purposes of data processing and to retain the data for no longer than is necessary to achieve those purposes.

The CGAI is firmly committed to complying with data protection obligations. This policy sets out how we manage document retention and for how long we will hold different categories of records and data. Under these rules, you have a right to be informed about how your personal data is processed. The GDPR sets out the information that we should supply to individuals and when they should be informed. We are obliged to provide you with information on our retention periods or criteria used to determine the retention periods.

### Grounds for processing

Legal grounds for processing personal data are as follows: Consent; Performance of a contract; Legal obligation; Vital interest; Public interest; or Legitimate interests. Special categories of data, also known as sensitive personal data are being processed require explicit consent - the CGAI does NOT operate in any manner that would require such information.

Where there is no justification for retaining personal information, then that information will be routinely deleted, we never keep information "just in case" a use can be found for it in the future.

Further retention of the personal data should be lawful only when it is compatible with the purposes for which it was originally collected. The CGAI does not carry out additional processing on records above their use for administering their charter as a not-for-profit governance body.

### Right of erasure

Individuals have the right to have their personal data erased and no longer processed where the data is no longer necessary in relation to the purposes for which collected or otherwise processed, or, the subject has withdrawn his or her consent or objects to the processing of personal data concerning him or her, or it does not otherwise comply with the GDPR.

## Document Retention

As a limited company, we are required to retain certain records, usually for a specific amount of time. The accidental or intentional destruction of these records during their specified retention periods could result in the following consequences: Fines and penalties, Loss of rights, Obstruction of justice charges, Contempt of court charges, Serious disadvantages in litigation.

We must retain certain records because they contain information that: Serves as corporate memory and has enduring business value (for example, they provide a record of a business transaction, evidence rights or obligations, protect our legal interests or ensure operational continuity.

Must be kept in order to satisfy legal, accounting or other regulatory requirements.

We must balance these requirements with our statutory obligation to only keep records for the period required and to comply with data minimisation principles. The retention schedule below sets out the relevant periods for the retention of Securitas' documents.

Records. A record is any type of information created, received or transmitted in the transaction of the CGAI's business, regardless of format. Examples of where the various types of information are located are: Contracts, Electronic files, E-mails, Invoices, Letters and other correspondence.

Therefore, any paper records and electronic files, that are part of any of the categories listed in the Records Retention Schedule contained in the retention section to this policy, must be retained for the amount of time indicated in the Records Retention Schedule.

A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or a litigation hold or other special situation) calls for its continued retention.

Disposable Information. Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a record as defined by this policy. Examples may include: Duplicates of originals, Preliminary drafts, and informal notes that do not represent significant steps or decisions in the preparation of an official record.

Personal Data. Personal Data is defined as any data which can identify an individual either on its own or when combined with other data which we possess. Some examples of personal data include names and addresses, email addresses. Here the CGAI acknowledges its obligations relating to personal data as set out in the DPA.

Unsolicited Information. Unsolicited confidential information submitted to the CGAI will be refused, returned to the sender where possible and deleted, if received via the internet.

## The role of the Data Protection

As a not-for-profit the CGAI does not have a Data Protection Officer. The destruction of electronic records must be coordinated with the CGAI board and reviewed at board meetings.

Any of the following activities (where occurring) shall be acknowledged at board meetings;

- Arranging for the proper storage and retrieval of records, coordinating with outside vendors where appropriate.
- Handling the destruction of records whose retention period has expired.
- Planning, developing and prescribing document disposal policies, systems, standards and procedures.
- Ensuring that the board is aware of their document management responsibilities.
- Establishing standards for filing and storage equipment and recordkeeping supplies.
- Determining the practicability of and, if appropriate, establishing a uniform filing system and a forms design and control system.
- Periodically reviewing the records retention schedules and legislation to determine if Securitas’ document management program and its Records Retention Schedule is in compliance with legislation.
- Planning the timetable for the annual records destruction exercise and the annual records audit, including setting deadlines for responses from departmental staff.
- Evaluating the overall effectiveness of the document management program.
- Reporting annually on the implementation of the document management program.

## Storing and Destroying Records

### Storage

Records are stored in a safe, secure and accessible manner. Any documents/files that are essential to our business operations during an emergency must be duplicated and/or backed up.

Corporate Records	Retention Period
Articles of Incorporation, Bylaws, Corporate Seal	Permanent
Annual corporate filings and reports	Permanent
Board policies, resolutions, meeting minutes, committee meeting minutes	Permanent
Contracts - Permanent if current	Permanent, 7y if expired
Construction documents	Permanent
E-mails (business related)	Permanent
All tax records	Permanent

Sales and purchase records	3 years
Resolutions	Permanent

**Retention Periods**

<b>Accounting and Finance</b>	<b>Retention Period</b>
Accounts Payable and Receivables ledgers and schedules	7 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled checks, deposit slips	7 years
Business expense records	7 years
Cash receipts	3 years
Details of cheques/stubs	7 years
Electronic fund transfer documents	7 years
Employee expense reports	7 years
General ledgers	Permanent
Journal entries & Invoices	7 years
Petty cash vouchers	3 years
<b>Tax Records</b>	<b>Retention Period</b>
All tax records	[Permanent/7 years]
<b>Legal and Insurance Records</b>	<b>Retention Period</b>
Appraisals	6 years from termination
Insurance claims/ applications	Permanent
Insurance disbursements and denials	Permanent
Insurance contracts and policies (Director and Officers, General Liability, Property, Workers' Compensation)	Permanent
Trademark registrations, evidence of use documents	Permanent

**Destruction**

The CGAI is responsible for the ongoing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of

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personal data, confidential, financial and personnel-related records must be conducted by shredding. The destruction of electronic records must be coordinated with the CGAI board and reviewed at board meetings.