

DATA RETENTION AND DESTRUCTION POLICY

This document provides guidelines for the retention and destruction of data by employees of **ConectUS Wireless**. 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 **ConectUS Wireless** maintains its official records in accordance with the requirements of all applicable laws and that official records no longer required by **ConectUS Wireless** are disposed of in a timely manner. This policy provides guidelines for the retention of official documents in ordinary commercial circumstances. It is also for the purpose of aiding employees of **ConectUS Wireless** in understanding their obligations in retaining electronic documents, including emails, Web files, text files, sound and movie files, PDF documents and all Office Suite or other formatted files.

2. POLICY

This policy represents the **ConectUS Wireless'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, fiscal, 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 staff and service providers to ensure that **ConectUS Wireless'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 **ConectUS Wireless** operations, including but not limited to:

- Typed or printed hardcopy (papers) documents;
- Electronic records and documents (email, Web file, 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 **ConectUS Wireless's** operation, including both original documents and reproductions. It also applies to the electronic documents described above.

This Policy was approved by the Board of Directors of **ConectUS Wireless** on January 1, 2022.

5. RECORD STORAGE PROCEDURES

- a) In order to facilitate the administration of this policy, where possible, the official records of **ConectUS Wireless** 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.
- c) Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records.

6. RESPONSIBILITY FOR RETENTION

Unless otherwise listed in the records retention schedule and subject to section 9 below, 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 a director or senior officer.

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.

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)	2 years
Credit Card Records (Customers)	2 years
Routine Letter/ Letter of General Inquiry/Letter of Complaint	2 years
Time Cards / Sheets	2 years
Personnel Count Records	3 years
PDF Files	5 years

Type of Record	Retention Period
Text/Formatted Files/Excel	5 years
Employee Medical Records	6 years
Employee Personnel Records	6 years
Unclaimed Wage Records	6 years
Accounts Payable Ledgers and Schedules	7 years
Accounts Receivable Ledgers and Schedules	7 years
Annual Audit Records	7 years
Approved Budgets	7 years
Bank Reconciliations	7 years
Bank Statements / Cancelled Cheques	7 years
Contracts	7 years after termination
Employment Contracts	7 years after termination
Financial Statement Working Papers	7 years
Inventory Records	7 years
Invoices / Receipts of Payment	7 years
Investment Records	7 years after the sale
Legal Memoranda & Opinion	7 years after the file
Original Grant Proposal	7 years after the grant
Payroll Records	7 years
Sales/Use/Tax Records	7 years
Tax Bills/Receipts/ Statement	7 years
W2 & W4 Forms	7 years
Correspondence and Internal Memoranda	Same period as the document they support
Group Insurance Plan (Active Employees)	Until plan is terminated
Annual Reports	Permanent
Court Orders	Permanent
Employment Applications	Permanent
General Ledger	Permanent
Governing Documents (Letters Patent, Certificate of Incorporation, Bylaws)	Permanent
Group Insurance Plans (Retiree)	Permanent
Insurance Contract	Permanent
Insurance Policies	Permanent
IRS & Other Government Audits Records	Permanent
IRS Ruling	Permanent
Licenses and Permits	Permanent
Minutes of Directors' Meetings	Permanent
Minutes of Executive Committee Meetings	Permanent
Property Insurance Policies	Permanent
Purchase/ Sale/Lease Agreement	Permanent
Performance Reviews	Permanent

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

10. CONFIDENTIALITY AND OWNERSHIP

All records are the property of **ConectUS Wireless** and employees are expected to hold all business records in confidence and to treat them as **ConectUS Wireless** assets. Records must be safeguarded and may be disclosed to parties outside of the **ConectUS Wireless** only upon proper authorization. Any subpoena, court order or other request for documents received by employees, or questions regarding the release of the **ConectUS Wireless's** records, must be directed to the Executive Director prior to the release of such records. Any records of the **ConectUS Wireless** in possession of an employee must be returned to the employee's supervisor or the Board of Directors 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 **ConectUS Wireless**.

11. EMPLOYEE AGREEMENT ON DATA RETENTION AND DESTRUCTION POLICY

I have read, understand, and agree to comply with the foregoing policies, rules, and conditions governing the use of the Company'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.

DATED: _____

EMPLOYEE

COMPANY

Authorized Signature

Authorized Signature

Print Name and Title

Print Name and Title