

ELA'S RECORDS RETENTION AND DISPOSAL PROCEDURE**1. Scope**

All records kept by Epure, Lizac si Asociatii SCA ("ELA"), whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

- 2.1 The following management positions are responsible for retention of these records because they are the information asset owners:
 - 2.1.1. Asset owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR.
 - 2.1.2. The Finance Manager is responsible for the retention of financial (accounting, tax) and related records.
 - 2.1.3. The HR manager is responsible for retention of all HR records and of the Health and Safety records.
 - 2.1.4. The Managing Partner is responsible for retention of all other legal and regulatory records and for storage of data in line with this procedure.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in ELA's ***Retention and Disposal Registry*** under the following categories:
 - 3.1.1 Record type
 - 3.1.2 Retention period
 - 3.1.3 Retention period to start from (at creation, submission, payment, etc.)
 - 3.1.4 Retention justification
 - 3.1.5 Record medium
 - 3.1.6 Disposal method
- 3.2 Each data asset that is stored shall be marked with the name of the record, the record type, the original owner of the data, the information classification, the date of storage, the required retention period, the planned date of destruction, and any special information (e.g. in relation to cryptographic keys).
- 3.3 Any cryptographic keys used shall be retained.
- 3.4 For all storage media (electronic and hard copy records), ELA retains the means to access that data.
- 3.5 For all electronic storage media, ELA shall not exceed 90% of the manufacturer's recommended storage life, which is recorded in ELA's ***Secure Disposal of Storage Media***

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log. When the maximum of 90% of expected storage life is reached, the stored data shall be copied onto new storage media.

- 3.6 The Managing Partner is responsible for destroying data once it has reached the end of the retention period as specified in ELA's **Retention and Disposal Register**. Destruction must be completed within 30 days of the planned retention period.
- 3.7 Portable/removable storage media are destroyed in line with ELA's **Secure Disposal of Storage Media log**.

Document Owner and Approval

The Managing Partner is the owner of this document and shall ensure that it is kept up to date. A current version of this document is available to all members of staff on ELA's website on page "Data Protection", section "Policies & Procedures". This policy was approved by Decision of Partners on 15.02.2018 and is issued under the signature of the Managing Partner.

Signature: Doru Epure – Managing Partner

Date: 15.02.2018