Data Retention and Destruction Policy

Effective Date: 07 Oct 2024

1. Introduction

This Data Retention and Destruction Policy outlines the approach of Razzberry's Tech Services Inc. ('the Organization') to managing data retention and ensuring the responsible and secure destruction of data when it is no longer required.

2. Purpose

The purpose of this policy is to ensure that the Organization:

- Complies with legal and regulatory requirements regarding data retention.
- Protects the privacy and security of data in its possession.
- Manages storage costs and optimizes data accessibility.
- Ensures timely and secure destruction of data that is no longer needed.

3. Scope

This policy applies to all employees, contractors, and third-party partners of the Organization who handle or manage data on behalf of the Organization.

4. Data Retention

4.1. General Principles

- Data shall only be retained for as long as necessary for the purpose for which it was collected.
- Retention periods shall comply with legal, regulatory, and industry standards.

4.2. Retention Schedule

 A detailed data retention schedule shall be developed and maintained, specifying the retention period for different categories of data.

4.3. Review and Audit

 Regular reviews and audits shall be conducted to ensure compliance with the retention schedule.

5. Data Destruction

5.1. General Principles

- When data reaches the end of its retention period, it shall be securely and irreversibly destroyed.
- Destruction methods shall ensure that data cannot be reconstructed or retrieved.

5.2. Methods of Destruction

• The methods of destruction may include shredding, degaussing, or secure electronic deletion, as appropriate to the data format.

5.3. Record of Destruction

• A record of the destruction of data shall be maintained, detailing what data was destroyed, how, when, and by whom.

6. Training and Awareness

All staff handling data shall receive training on this policy, and the importance of effective data management and security.

7. Policy Review and Update

This policy shall be reviewed annually and updated as necessary to reflect changes in legal requirements and best practices.

8. Compliance and Enforcement

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment.

Signature: <u>Mitchell Laframboise</u>
Mitchell Laframboise

Executive Director

07 October, 2024