



RECORD RETENTION AND DISPOSITION STANDARD

Effective: September 1, 2020

Purpose of Standard

The purpose of this Standard is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed by Catalyst or are of no value are discarded at the proper time. This Standard is also for the purpose of aiding employees and contractors in understanding their obligations in retaining physical and electronic documents in any format.

Application of Standard

The scope of this Standard includes all personnel who have or are responsible for the creation of or changes to all physical and electronic records generated in the course of Catalyst's operations, including both original documents and reproductions.

Standard

1. **Record Retention Schedule:** A Record Retention Schedule is approved as the retention and disposal schedule for Catalyst. In the absence of a schedule, a minimum retention of 180 days is required. The Chief Privacy Officer (Administrator) is the officer in charge of the administration of this Standard and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is also authorized to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories for Catalyst; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Standard.
2. **Suspension of Record Disposal in Event of Litigation or Claims:** In the event Catalyst is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Catalyst or the commencement of any litigation against or concerning Catalyst, such employee shall inform the Information Steward, Administrator and VP Information Technology and any further disposal of documents shall be suspended until such time as the VP Information Technology, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Violations of Standard

- **Non-Compliance.** An employee who violates this Standard may be subject to disciplinary action, up to and including termination of employment.

Related Standards, Policies and Processes

- Data Classification Standard
- Information Governance Policy
- Record Retention Schedule

Definitions and Terms

- None

Administration of this Standard

- **Questions.** You are encouraged to ask any questions you may have about this Standard. To learn more, please contact secure@catalyst.org.
- **Reporting.** It is important that you immediately report any suspected violation of this Standard by a Catalyst employee or third party to your manager or to HR. All good faith allegations of violations of this Standard will be fully and confidentially investigated.
- **Exception to Standard.** Limited exceptions to the Standard may apply due to variations in devices and platforms. Management does not have the authority to approve exceptions to this Standard. Any request for an exception to the requirements of this Standard must be submitted to the Information Security Officer, who will review the risk of non-adherence and issue exceptions where deemed prudent.
- **Applicability.** This Standard applies globally unless contrary to local laws and regulations. Operations in different countries may have more stringent policies or implementing procedures where required by local law. In the event of a conflict, these more stringent policies or implementing procedures will take precedence.

Revision History

Date	Name	Description	Responsibility
09/01/2020	James Mbassa	Initial release.	Owner