



The ID Register

Record Retention and Record Disposal Policy



1. PURPOSE

The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained in compliance with regulatory requirements. The purpose is also to ensure that records that are no longer needed are disposed of at the proper time.

This Policy is also to aid employees in understanding their obligations in retaining electronic material including but not limited to e-mails, web files, PDF documents and all Microsoft Office formatted files.

2. POLICY

This Policy details The ID Register's approach to the retention and disposal of records including electronic material.

Records must be destroyed once they have reached the end of the retention period as identified in Appendix 1 of this Policy.

The implementation of this Policy applies to all documents created on or after the 25th May 2018. A phased approach will be undertaken to apply this Policy to documents created before this date.

3. MEDIUM OF RETENTION

Documents must be retained for the required retention period in either original or electronic format.

4. ADMINISTRATION

Appendix A is the Record Retention and Disposal Schedule for the initial maintenance, retention and disposal of physical and electronic records.

The Legal Manager is responsible for the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention and Disposal Schedule is followed.

The Legal Manager is also authorised to:

- make modifications to the Record Retention and Disposal Schedule from time to time to ensure that it is in compliance with local laws and regulations and includes the appropriate document and record categories;
- monitor legislative changes affecting record retention;
- annually review this Policy; and
- monitor compliance with this Policy

5. SUSPENSION OF RECORD DISPOSAL: LITIGATION AND CLAIMS

In the event The ID Register becomes engaged in litigation or receives a request for documents relating to litigation involving a client, the first staff member to become aware of the litigation shall inform the Legal Manager. Any further disposal of documents shall be suspended until such time as the Legal Manager determines otherwise. The Legal Manager shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

6. APPLICABILITY

This Policy applies to all electronic and physical records generated in the course of The ID Register's operations including both original documents and reproductions.

The end of a relationship is defined as the date upon which The ID Register, having complied with any applicable notice periods, notifies a client entity or investor that its records have been offboarded or The ID Register ceases its relationship with a supplier, employee or similar.

APPENDIX A – RECORD RETENTION AND DISPOSAL SCHEDULE

RETENTION PERIOD

The ID Register records relating to The ID Register's own business will be retained for 10 years after the end of a relationship.

Client entity records will be retained for 10 years after the end of a relationship.

The list of The ID Register records include:

1. Accounting and Finance
2. Contracts
3. Corporate Records
4. Correspondence and Internal Memoranda
5. Electronic Documents
6. Insurance Records
7. Legal Files and Papers
8. Payroll Documents
9. Pension Documents
10. Personnel Records
11. Property Records
12. Tax Records
13. Contribution Records
14. Programs & Services Records
15. Compliance & AML Records

The list of client entity records include:

1. Client CDD and Onboarding
2. Fund Closings
3. Investments
4. Divestments
5. Meetings
6. Accounting and Finance
7. Contracts
8. Corporate Records
9. Correspondence
10. Investor CDD including FATCA & CRS Reportable Data
11. Subscription Documents
12. Compliance & AML Records
13. Ongoing Monitoring