

A WORLD OF LABELS (AWOL)

RETENTION OF RECORDS PROCEDURE

1. Introduction

1.1 In this Retention of Records Procedure, 'A WORLD OF LABELS GROUP' (AWOL) refers to A WORLD OF LABELS Ltd and its subsidiaries, and all the words and expressions used in this Retention of Records Procedure shall be interpreted and construed in line with the definitions used in AWOL's General Data Protection Policy.

1.2 This Retention of Records Procedure should be read and interpreted in conjunction with and subject to AWOL's General Data Protection Policy that governs all the personal data processing activities of AWOL.

1.3 All AWOL's records, whether analogue or digital, are subject to the retention requirements of this Retention of Records Procedure.

2. Responsibilities

2.1 For the purpose of this Retention of Records Procedure, the Board of Directors of AWOL has designated specific persons within AWOL as the ones responsible, as information asset owners, for the retention of specific categories of data records handled by AWOL in the course of its business activities as set out in its General Data Protection Policy.

2.2 Each of the said designated *préposés* of AWOL will be responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR and the DPA.

2.3 The following persons within AWOL will have the following data records responsibilities:

2.3.1 the Chief Financial Officer (CFO) is responsible for retention of financial (accounting, tax) and related records;

2.3.2 the Head of HR is responsible for retention of all HR records;

2.3.3 the Health and Safety Officer is responsible for retention of all Health and Safety records;

2.3.4 the Company Secretary is responsible for retention of all other statutory and regulatory records;

2.3.5 the Data Protection Officer is responsible for storage of data in line with this Retention of Records Procedure; and

2.3.6 the Chief Executive Officer (CEO) is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

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3. Procedure

- 3.1 The required retention periods, by record type, are recorded in the herewith annexed/attached Retention of Records Schedule 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; and
 - 3.1.6 Disposal method.
- 3.2 Each data asset that is stored is marked *[how and by whom]* with the name of the record, the record type, the original owner of the data, the required retention period and the planned date of destruction.
- 3.3 For all storage media (electronic and hard copy records), AWOL retains *[specify where and how]* the means to access that data.
- 3.4 The Data Protection Officer of AWOL is responsible for destroying data once it has reached the end of the retention period as specified in the herewith annexed/attached Retention of Records Schedule.

Document Owner and Approval

AWOL is the owner of this document.

This document may, from time to time, be reviewed in line with any changes in the AWOL's General Data Protection Policy and the law.

This Retention of Records Procedure was approved by the Head of IT of AWOL on *[date]* and is issued on a version-controlled basis under his/her signature.

Signature:

Date: