

# Record Retention and Destruction Policy

## 1) Policy

This Policy represents the Grace to You's policy regarding the retention and disposal of records, whether physical or electronic. For the purposes of this policy records include: documents, emails, files, databases, and backups.

#### 2) Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for certain records of Grace to You. The Controller & CFO (the "Administrator") is the officer in charge of the administration of this Policy 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 Grace to You; to monitor local, state and federal laws affecting record retention; to review the record retention and disposal program annually; and to monitor compliance with this Policy.

## 3) Responsibility

All employees and board members have the responsibility to notify the Administrator if they become aware of a governmental investigation or audit concerning Grace to You or the commencement of any litigation against or concerning Grace to You. Although employees and board members create records that are not described in Appendix A and therefore may ordinarily be disposed of at any time or retained for any period, all employees and board members must immediately suspend the disposal of <u>any</u> records upon notification by the Administrator, whether the records are listed in Appendix A or not. Employees may not delegate any responsibilities under this policy to volunteers or outsiders, without written approval from the Administrator.

### 4) Suspension of Record Disposal In Event of Litigation or Claims

In the event Grace to You is served with any subpoena or request for records or the Administrator becomes aware of a governmental investigation or audit concerning Grace to You or the commencement of any litigation against or concerning Grace to You, any further disposal of records shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all employees of any suspension in the further disposal of records.

### 5) Applicability

This Policy applies to all physical records generated in the course of Grace to You's operation, including both original records and reproductions. It also applies to the electronic records described above.

This Policy was approved by the Board of Directors of Grace to You on October 22, 2014.