



DOCUMENT AND RECORD RETENTION STANDARD

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1 INTRODUCTION

This standard provides for the systematic review, retention, and destruction of documents received or created by SMA Technologies. This standard covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed. The standard is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate SMA Technologies operations by promoting efficiency and freeing up valuable storage space.

2 PURPOSE

The goals of this Document and Record Retention Standard are to:

1. Retain important documents for reference and future use;
2. Delete documents that are no longer necessary for the proper functioning of Organization;
3. Organize important documents for efficient retrieval; and
4. Ensure that you, as an employee, know what documents should be retained, the length of their retention, means of storage, and when and how they should be destroyed.

3 DOCUMENT RETENTION

SMA Technologies follows the document retention procedures outlined below. Documents that are not listed but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

1. **Email Backups** – Current and former employee email backups shall be retained for a period of five years.
2. **Corporate Records** – Corporate records are kept on a permanent basis unless otherwise noted by the Information Owner.
3. **Financial Records** – Financial records such as accounting, tax, and payroll shall be retained seven years and/or permanently as deemed by the Information Owner.
4. **Legal Documents** - Legal should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten years. OpCon Terms and Conditions, Data Protection Addendum, and Privacy Policy are archived online indefinitely for future reference.
5. **Personnel Records** – State, federal and international statutes require the Company to keep certain recruitment, employment, and personnel information. SMA Technologies should also keep personnel files that reflect performance reviews and any complaints brought against SMA Technologies or individual employees under applicable state, federal and international statutes.

SMA Technologies should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel.

6. **Contracts** - Final, executed copies of all contracts entered into by SMA Technologies should be retained for at least seven years beyond the life of the agreement, and longer in the case of publicly filed contracts.
7. **Intellectual Property** - Development documents and source code are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are of value to SMA Technologies and are protected as a trade secret, as well as SMA Technologies source code. Development documentation and source code are kept on a permanent basis.
8. **Press Releases/Public Filings** - SMA Technologies should retain copies of all press releases and publicly filed documents under the theory that SMA Technologies should have its own copy to test the accuracy of any document a member of the public can theoretically produce against SMA Technologies. These documents should be retained for a period of five years from the release date.
9. **ISMS Audits** – Documentation will be retained using the current audit, plus the previous three audits for reference.
10. **Miscellaneous** - Other documentation that SMA Technologies utilizes for its business, such as, policies, charters, standards, processes, procedures, work instructions, etc., may be kept dependent upon the need for SMA Technologies. When available, maintaining the current version, plus the previous version for reference is recommended.

4 DOCUMENT DESTRUCTION

SMA Technologies Information Owners (as described in the *Information Classification and Handling Standard*) are responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

5 COMPLIANCE

Failure on the part of employees to follow this standard can result in possible civil and criminal sanctions against SMA Technologies and its employees and possible disciplinary action against responsible individuals. SMA Technologies will periodically review these procedures to ensure that they are in compliance with new or revised regulations.

6 OWNERSHIP AND REVIEW

This standard is owned by the ISMS Manager.

This standard shall be reviewed on an annual basis.

Changes to this document shall be in accordance with the ***ISMS Document and Records Control Standard***.

6.1 CONTACT INFORMATION

ISMS Steering Committee
 (281)446-5000
 ISMS@SMATECHNOLOGIES.COM

6.2 DOCUMENT RACI

Responsible	Assigned to do the work	ISMS Manager
Accountable	Final decision, ultimately answerable	ISMS Steering Committee
Consulted	Consulted BEFORE an action or decision is taken (proactive)	Executive Leadership Team
Informed	Informed AFTER a decision or action has been taken (reactive)	Named Participants in this document Other parties affected by the change