

Data Retention Policy



WHY

To help us preserve our Records as part of your service to us.



WHEN

Whenever you are required to Archive our Records on our behalf.



WHAT to know about **HOW** to comply

1. Requirements for retention and archiving

- If we agree with you in the Agreement that you will Archive our Records for us, you will make sure that the Archive is compliant with Applicable Laws (including, without limitation, the requirements relating to designated third parties under SEC 17a(4)).
- When archiving our Records you must:
 - safeguard the immutability of all Records in your possession;
 - tag Records with the appropriate Record Series, jurisdiction, Retention Period and Trigger Event Date, each as specified by us;
 - Archive Records as soon as possible and no later than three months after the Trigger Event Date;
 - ensure that we're able to access our Records at any time during the Term of the Agreement and after expiry or termination of the Agreement if you continue to maintain any Records pursuant to paragraph 4 of this Policy;
 - create Metadata each as specified by us to locate, search and retrieve and manage the Records; and
 - maintain written access logs to Archived Records, including information of search, access and retrieval

activities during the Retention Period. Logs must indicate who has accessed which Archived Records and when.

2. Disposal and deletion

- You must delete any Record at the end of the Retention Period (unless we tell you that a Record is on Legal Hold) as soon as practically possible and no later than 12 months after the expiry of the Retention Period. Any Records on Legal Hold must be retained until we tell you that the Legal Hold has been lifted.
- You must maintain a disposal log which will include the date of the disposal, the Record Series, and the Trigger Event Date. These disposal logs must also be Archived under the same requirements of this Policy.

3. Documentation and reporting

- On our request you will provide us with a report on the Archive, detailing how the Archive is set up, any related processes and any changes to the Archive you have implemented.

4. Termination and expiry

- At the expiry or termination of the Agreement, on our instructions you must either transfer all Records (including Metadata) to us within a timeframe specified by us or continue to retain the Records as agreed for the remainder of the Retention Period and dispose of the Records at the end of the Retention Period in accordance with paragraph 2 of this Policy.
- If Records remain with you, you must, after the respective Retention Periods have expired, confirm disposal, and share the disposal log with us as early as possible, but no later than 3 months from expiry of the Retention Period.