



Records Management Policy

Version number: 1.0

Publish date: 16-05-2018

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| Document control | |
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| Authorised by | Upper Management |
| Physical Copy location(s) | Operations Folder |
| Source Copy Location(s) | Dropbox - GDPR123\Documents\Final Documents |
| Published Copy Location(s) | www.Dephoto.biz\GDPR |
| Other Referenced Documents | Managing Outsourced Business Processing Procedure, Disposals Procedure, Information Classification Procedure, Fair Processing Procedure, Data Protection Policy, Information Security Policy |
| Related Material | |
| Acknowledgements | GDPR123 |
| Distribution | Upper Management, Franchise Owners, All Staff |

| Version Control | | | | |
|-----------------|---|--------------------|---------------|-----------|
| Title | Records Management Policy | | | |
| Description | Defines controls to the management of data records. | | | |
| Created by | Mike Moore | | | |
| Date Created | 16-05-2018 | | | |
| Maintained by | Upper Management | | | |
| Version Number | Modified By | Modifications Made | Date Modified | Status |
| 1.0 | Mike Moore | First creation | 16-05-2018 | Published |
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Purpose

DE Photo (Franchising) Ltd (Referred to as the company here after) relies on strict controls to the management of data records. Data records must be maintained, updated, classified and disposed of in a controlled manner to ensure consistency and visibility of all data which also will enable the portability of data when needed.

Scope

This policy applies to all records controlled by the company. Any controlled third party records must also have mechanisms in place to ensure that the record management controls meets or exceeds the standards of this policy.

Definitions

Records – Data records used to fulfil an obligation or purpose and to provide accountability.

Policy

Record audit trail

When creating a record for use within the company, the party creating the record must ensure that there is an audit trail that can be followed for the following reasons:

- The reasons and requirements for the record creation are identified.
- Any processing of the record can be monitored and controlled.
- The record does not get forgotten, misplaced or lost.
- The record does not get unauthorised changes made to it.

Managing records

Records are created using the following process:

For managing the data records with third party suppliers, please see the Managing Outsourced Business Processing Procedure
found at Dropbox: \GDPR\Documents\Final Documents

Records are disposed of using the Disposals Procedure
found at Dropbox: \GDPR\Documents\Final Documents

Records are classified using the Information Classification Procedure
found at Dropbox: \GDPR\Documents\Final Documents

Records are retained only for as long as needed and are specified in accordance to the Fair Processing Procedure.

Records are protected by current legislation in accordance to the Data Protection Policy
found at Dropbox: \GDPR\Documents\Final Documents

Compliance

Compliance Measurement

Compliance to this policy is determined through various methods, including but not limited to, periodic training, internal and external audits, and feedback to the information security dept.

Exceptions

Any exception to the policy must be approved in advance by the Information Security Policy and noted in this policy.

Non-Compliance

Compliance with this policy is not optional. Any employees or franchisees that are found to have violated this policy will be subject to the disciplinary terms detailed in the Data Protection Policy in line with the severity of the offence and the damages caused.

Contractors or related third parties that are found to have violated this policy will be liable for damages as laid out in the contract terms and may be subject to legal actions.

Management and Review

This document must be reviewed at least annually or earlier if there is a change to systems or is a need to update policies due to enhancements in security, software or additions to legislation.

Last Review Date: 16/05/2018

Next Review Date: 16/05/2019