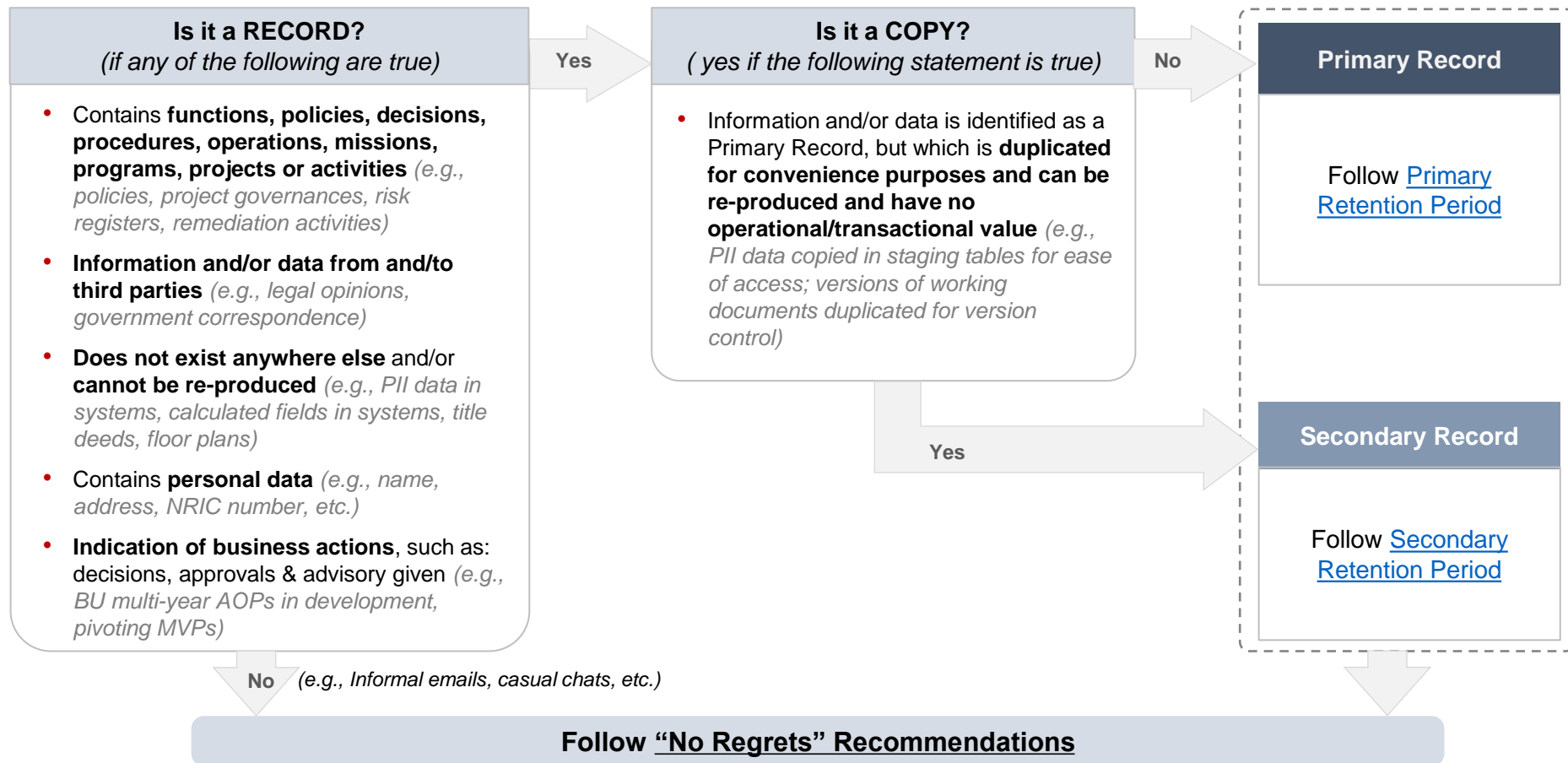




empower
every
generation

Group Records Retention Policy

Is it a Record? – *Definition*



When in doubt, contact BU DG or GCDO for advisory

INTERNAL ONLY

Retention Period (1/2) – *Primary Records*

Unless a Litigation Hold¹ is issued or exceptions apply, Primary Records retain for **7 years from Completion of Matter***

<u>Default Retention Period for all Primary Records (incl. Financial and Audit)</u>	<u>Exempted Primary Records with other periods²</u>	<u>Examples</u>
<div>Completion of matter + 7 years (e.g., meta-data, data lineage etc.)</div> <div>except</div>	Corporate Secretarial Records	<ul style="list-style-type: none">Annual reports, board papers, meeting minutesRegister of present and past substantial shareholders
	Legal Records	<ul style="list-style-type: none">Litigation files, intellectual property recordsMergers & Acquisitions/joint venture records, significant projectsSGO files/matters under foreign laws (follow country retention period)
	Titles/Deeds Records	<ul style="list-style-type: none">Land Titles/Strata Titles/DeedsOther asset titles (e.g., vehicles, etc.)
	Facilities Records	<ul style="list-style-type: none">Building records, floor plans, addition & alteration approvalsConstruction contracts, etc.Noise pollution records (Workplace Safety & Health Regulations)
	Personal Data ³	<ul style="list-style-type: none">Privacy Act retention standards (existing DPO retention schedule)Analytics which requires long term data history (e.g., Customer Life Cycle)
	Business Records ^{4, 5}	<ul style="list-style-type: none">Business records, excluding Personal Data, Corp Sec, Legal, Title/Deeds/ Ownership and Facilities Records (e.g., weekly/monthly reports, AOP, etc)

* Completion of Matter means conclusion/closure of a business activity/transaction/project or termination/expiry of contracts

¹ Litigation holds to preserve documents/records until the completion of court proceedings/disputes

² May have shorter or longer retention periods

³ Subjected to the laws of the country, with retention period defined by existing PDI process

⁴ Business needs **must** adhere to applicable laws

⁵ Non-Singtel Group content (follow third party's retention policy)

Retention Period (2/2) – *Secondary Records*

Secondary Retention Period are based on risk tolerance and exposure. All Secondary Records may be retained for **maximum of 3 months from completion of matter***

Examples of Secondary Records

- Copies and duplicates of reports generated for performance tracking
- Attachment sent through emails for sharing between team members
- Data extracts from systems
- Temporary data stored in databases for code optimization
- Cache data stored in memory/database for query optimization

Retention Period

Completion of
Matter
+
< 3 months

“No Regrets” Recommendations

1. **Use Data Classification**
 - For appropriate distribution and treatment
2. **Use Approved Storage/BI Tools**
 - Staff to store files in SharePoint/One Drive and distribute via links instead of attachments
 - Drive more business reporting via Biz intelligence tools like Power BI/Tableau instead of email distribution
3. **Log and keep track**
 - BU Data Gov Team to facilitate approval needs from selected systems (e.g., BCC, Data Lakes) and keep track of retention
4. **Script for automated clean-ups**
 - Application & database developers to script for automated clean-ups/table drops upon completion of task

* Completion of Matter means conclusion/closure of a business activity/transaction/project or termination/expiry of contracts



Thank you!

Appendix: Checklist – *Supporting Self House Keeping (Illustrative)*

A set of checklist questions are provided to help all staff and system owners

Information (Document) Handling

(All Staff)

No	Self Check Questions	Answers (Yes as compliant)
1	Do you ensure that the materials have its classification & controls applied?	<u>Yes</u> / No / Not Sure
2	Do you ensure that classified hardcopy materials have their classification label on every page and stored in a secure environment?	<u>Yes</u> / No / Not Sure
3	Have you obtained the relevant approvals for classified materials stored in non-authorized storage?	<u>Yes</u> / No / Not Sure
4	To your best knowledge, you do not have primary/secondary records that are stored beyond the allowed retention period.	<u>Yes</u> / No / Not Sure
5	For primary/secondary records that are to be deleted, do you ensure that classified materials are deleted in a secured manner?	<u>Yes</u> / No / Not Sure
6	Have you store and share your files through a central server (e.g., SharePoint/OneDrive)?	<u>Yes</u> / No / Not Sure
7	If your record document falls under business records retention, is the retention period captured in your BU DG retention repository?	<u>Yes</u> / No / Not Sure

Data (System) Handling

(System Owners)

No	Self Check Questions	Answers (Yes as compliant)
1	Do you obtain Data and Service Owner approval before performing Data Purging?	<u>Yes</u> / No / Not Sure
2	Do you perform Data Integrity checks and Application Impact assessment with SME before Data Purging?	<u>Yes</u> / No / Not Sure
3	To your best knowledge, you do not have primary/secondary records that are stored beyond the allowed retention period.	<u>Yes</u> / No / Not Sure
4	Do you have any back up strategy mechanism to restore data if there is any corruption while performing Data Purging?	<u>Yes</u> / No / Not Sure
5	If application logs contains sensitive data, do you perform Data Purging?	<u>Yes</u> / No / Not Sure
6	If your record data falls under business defined retention, is the retention period captured in your BU DG retention repository	<u>Yes</u> / No / Not Sure