

MadeUpName, LLC

HR Documentation & Recordkeeping Policy

Purpose

This policy establishes standards for maintaining, protecting, and retaining employee and HR-related records at MadeUpName, LLC. Proper recordkeeping ensures compliance with legal requirements, data privacy standards, and company operational needs.

Scope

This policy applies to all employee, contractor, and applicant records managed by the Human Resources Department, as well as any manager responsible for maintaining HR documentation.

1. Record Types

HR maintains records in the following categories: - **Employment Records:** Applications, resumes, offer letters, employment agreements, and classification documents.

- **Payroll & Benefits Records:** Tax forms (W-4, I-9), timekeeping data, compensation, and benefits enrollment.
- **Performance Records:** Reviews, disciplinary actions, and recognition documentation.
- **Training Records:** Certifications, learning participation, and compliance training logs.
- **Separation Records:** Exit interviews, termination letters, and COBRA information.

2. Record Retention Periods

Retention schedules comply with federal and state regulations: - Personnel files: **7 years** after termination.

- I-9 forms: **3 years** after hire or **1 year** after termination, whichever is later.
- Payroll and tax records: **4 years** after the due date of the tax return.
- Benefits documentation: **6 years** after the plan year.
- Recruitment files: **2 years** after the hiring decision.
- Incident and safety records: **5 years** or as required by OSHA.

3. Data Storage and Security

- All HR records are stored securely in electronic or physical form with restricted access.
- Confidential records (e.g., medical, background checks) are stored separately from general personnel files.
- Digital records are stored on secure company-approved systems with password protection and encryption.

4. Access to Records

- Employees may request to review their own personnel file by submitting a written request to HR.
- Access will be provided within a reasonable timeframe in compliance with state law.
- Only authorized personnel may access employee files for legitimate business purposes.

5. Record Disposal

When retention periods expire, HR will securely destroy records by shredding physical copies or permanently deleting digital files in accordance with the Data Protection & Privacy Policy.

6. Legal Holds

In case of audits, investigations, or legal actions, HR will suspend normal record destruction for any records relevant to the issue until the matter is resolved.

7. Confidentiality and Privacy

All HR records are confidential and managed in compliance with applicable privacy laws, including the New York State Privacy Act and federal labor laws.

8. Responsibility

- **HR Department:** Maintain, protect, and monitor recordkeeping compliance.
- **Managers:** Forward HR-related documentation promptly and accurately.
- **Employees:** Provide accurate information and safeguard documents in their possession.

9. Related Policies

This policy should be read alongside the Data Protection & Privacy Policy and the Employment Classification Policy.

Effective Date: January 2025

Next Review Date: January 2026

Policy Owner: Human Resources Department