



## Data Retention and Destruction Policy

September 23, 2023

### 1. Objective

The purpose of this policy is to provide procedures for the closure, retention and destruction of files maintained by Humanity & Inclusion Canada.

### 2. Definitions

2.1 In this policy :

**"File Closure Date" means** the date on which the person in charge of a file has determined that the file has been closed and from which he/she determines that the file should be destroyed.

**"File destruction date" means** the date from which a file can be destroyed.

**"File" means** a document or computer record that may contain personal information. A donor file in your database that generally contains personal information is a file for the purposes of this policy.

### 3. Examine and close the folder

3.1 When a file or folder is closed, the person in charge determines its closing date and its destruction date. A file or record containing personal information may be destroyed, anonymized or de-indexed in accordance with the law. Humanity & Inclusion Canada will destroy any file for which no consent to the use of PR has been obtained by September 22, 2023, or consent has been given but the date has reached 10 years.

3.2 Before closing a physical file, the person in charge must take the necessary steps to ensure that all personal information in the file is destroyed, in particular by shredding;

3.3 Humanity & Inclusion Canada must also delete duplicate electronic copies of documents that have been saved.

3.4 When the file is closed, Humanity & Inclusion Canada enters a note to this effect in its records.

3.5 Humanity & Inclusion Canada keeps records identifying closed files, including the date of closure and, if applicable, the date of destruction.

#### **4. Retention of closed files**

4.1 Closed files are stored in a physical location to maintain the confidentiality of personal information obtained and to protect it from damage or loss. They may also be stored on a computer medium (e.g. SharePoint).

#### **5. Destruction of files**

5.1 When the case manager closes the file and if the file is ready for destruction (see article below), the destruction date is determined according to the Humanity & Inclusion Canada standard as defined in article 5.2 unless the case manager determines that another destruction date would be more appropriate.

5.2 Humanity & Inclusion Canada retains closed files primarily to satisfy risk management concerns. Accordingly, it is prudent to keep the file closed for a period of time determined by the statute of limitations, during which claims may be made against Humanity & Inclusion Canada.

When in doubt, the case manager should designate the longest applicable period preceding the destruction date. The destruction date for most files should be **ten (10)** years after the closing date set by the case manager. A different destruction date should be set by the case manager depending on the circumstances of the case.

5.3 The destruction date shall be suspended in the following cases relating directly or indirectly to the matter: a) an actual or potential claim filed against Humanity & Inclusion Canada, b) a request for disclosure relating to personal information obtained by Humanity & Inclusion Canada, c) government audits and investigations. This may be ordered by the person responsible for the protection of personal information.

5.4 The file destruction date may be postponed at any time if necessary.

5.5 This policy must be applied in such a way as to ensure that the confidentiality of personal information contained in files is maintained and that applicable laws on the protection of private information are complied with.

5.6 Any closure or destruction of a file must first be authorized by the person responsible for the protection of personal information.

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