

**TRIPLE ADVANCED INVESTMENTS 51 (PTY) LTD**

**Data Retention Policy and Procedure**

## 1. DOCUMENT VERSION CONTROL

Number	Date issued	Created by	Comments
1	17 June 2021	G.L. Esterhuizen	

## 2. RETENTION OF INFORMATION

- 2.1 POPIA prescribes that Records of Personal Information may not be kept for any period longer than is necessary for achieving the purpose for which the information was collected unless:
- 2.1.1 When required by law: Records may be retained for longer when the retention is required or authorised by law.
  - 2.1.2 Reasonably required: Records may be retained for longer when the organisation “reasonably requires the record for lawful purposes related to its activities and functions”.
  - 2.1.3 Required by contract: Records may be retained for longer if the retention is required to enable the Organisation to perform under the Contract.
  - 2.1.4 Consent: Records may be retained for longer if the data subject has provided specific, voluntary and informed consent for the retention thereof.
  - 2.1.5 Section 14(2) – (7) provides further exceptions relating to retention for research/ statistical purposes, where the personal information was used in a decision about the data subject and restriction of records.

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### 3. PROCEDURE FOR ENSURING COMPLIANCE WITH RETENTION PERIODS

- 3.1 The Information officer shall create an Information and Records Retention Control Document which:
- 3.1.1 identifies all the types of records and information retained in the organisation;
  - 3.1.2 identifies where the information and records exists and/or is retained;
  - 3.1.3 indicates the Operational, Regulatory and Historical value of the types of records information; and
  - 3.1.4 prescribes the retention requirements per record type.
- 3.2 The Information Officer shall ensure that destruction of records and information is carried out regularly as indicated in the Information and Records Retention Control Document.
- 3.3 The information Officer shall conduct records and information retention audits to ensure compliance with the Control Document.

### 4. COMPLIANCE

- 4.1 Any employee that fails and/or refuses to discharge any duties detailed in this Policy and the associated procedures and instruction will be in breach of the Policy. Any uncertainty as to the provisions of this Policy or any duty detailed herein may be directed to the Information Officer or Deputy Information Officers.

  
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G.L. Esterhuizen  
Information Officer