

RETENTION OF RECORDS (TIER 2)

Document Control

Reference: GDPR DOC 2.3

Issue No: 1.0

Issue Date: 10/11/2023

Page: 1 of 3

1. Scope

All Mr Marine Group BV's records, whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2 Asset owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR.
- 2.3 The Finance Director is responsible for retention of financial (accounting, tax) and company / statutory documents.
- 2.4 The Head of HR is responsible for retention of all HR records.
- 2.5 The Data Protection Officer / GDPR Owner is responsible for storage of data in line with this procedure.
- 2.6 The Executive team is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in under the following categories:
 - 3.1.1 Record type
 - 3.1.2 Retention period
 - 3.1.3 Retention period to start from (at creation, submission, payment, etc.)
 - 3.1.4 Retention justification
 - 3.1.5 Record medium
 - 3.1.6 Disposal method
- 3.2 Each data asset that is stored is marked with the name of the record, the record type, the original owner of the data, the information classification, the data of storage, the required retention period, the planned date of destruction, and any special information (e.g. in relation to cryptographic keys).
- 3.3 For all storage media (electronic and hard copy records), Mr Marine Group BV retains the means to access that data.
- 3.4 The Data Protection Officer / GDPR Owner alongside Asset Owner are responsible for destroying data once it has reached the end of the retention period. Destruction must be completed within 60 days of the planned retention period.

Commented [A1]: In this context retention means, 'ensuring that those documents that need to be retained are retained and are handed over to the [Change Manager] for storage'.

Commented [A2]: Emails containing personal data should be retained, archived and destroyed in line with your email retention policy. While it is unlikely an organisation will be able to monitor all emails containing personal data, the DPO could record it in certain situations, such as when right of access is used.

Commented [A3]: For each electronic storage media, you should identify (perhaps in a supplementary schedule) the operating system, application and hardware requirements necessary to be able to run the data item – in 3.4 you should identify how you will ensure that, as you upgrade hardware and software in future, you retain the capability of accessing the stored data. If you use an independent storage vault solution, this is where you would pull it in to your procedures.

Commented [A4]: Some organisations might need to insert additional safeguards here – e.g. requiring authorisation prior to destruction of particular record types.

Mr Marine Group BV



RETENTION OF RECORDS (TIER 2)

Document Control

Reference: GDPR DOC 2.3

Issue No: 1.0

Issue Date: 10/11/2023

Page: 2 of 3

Record Type	Retention Period (NL)	Organization Retention Period	Retention Start Period (NL)	Retention Justification	Record Medium	Location	Secure Disposal Method	Owner	Department
Employee Personnel Records	As per Dutch employment laws	Indefinite (for business purposes)	Date of employment termination	Compliance with employment laws and potential legal disputes	Digital and Hard Copy	HR Department	Shredding	Head of HR	Human Resources
Financial Transactions	As per Dutch tax laws	Indefinite (for business purposes)	End of the financial year	Compliance with tax laws and audits	Digital and Hard Copy	Finance Department	Secure Electronic Wiping	Finance Director	Finance
Customer Contracts	As per Dutch legal obligations	Indefinite (for business purposes)	Date of contract termination	Legal obligations and potential disputes	Digital and Hard Copy	Legal Department	Secure Shredding	Legal Counsel	Legal
Health and Safety Records	As per Dutch regulations	Indefinite (for business purposes)	Date of the incident	Compliance with health and safety regulations	Digital and Hard Copy	Health and Safety Department	Secure Shredding	Health and Safety Officer	Health and Safety
Emails	As per Dutch regulations	Indefinite (for business purposes)	Date of the email	Legal, regulatory, and business requirements	Digital	Email Server or Archive	Secure Deletion	IT Department	IT or relevant department
Partner Contracts	As per Dutch legal obligations	Indefinite (for business purposes)	Date of contract termination	Legal obligations and business continuity	Digital and Hard Copy	Sales Department	Secure Shredding	Legal Counsel	Legal or Partnerships
Business Documents (Quotations, Purchase Orders, Sales Orders, Invoices)		Indefinite (for business purposes)	Date of document creation	Business operations and continuity	Digital and Hard Copy	Relevant Department	N/A (Indefinite Retention)	Relevant Department	Relevant Department

Mr Marine Group BV



RETENTION OF RECORDS (TIER 2)

Document Control

Reference: GDPR DOC 2.3

Issue No: 1.0

Issue Date: 10/11/2023

Page: 3 of 3

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to *all* members of staff on the *corporate shared drive*.

This procedure was approved by the COO on 10/11/2023 and is issued on a version-controlled basis under his/her signature.

Signature:



Date: 14/11/2023

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Mihnea Radulescu	10/11/2023

Mr Marine Group BV

