
SLRC Data Privacy and Document Retention Policy

Summary

The SLRC and the Board of Directors utilize paper and certain electronic data and email systems in the course of ordinary Club business. As such, SLRC maintains records necessary to conduct business including personal contact and emergency medical information for members and internal communications. This document outlines the data privacy and record retention responsibilities of staff, volunteers, members of the Board of Directors, and external contractors for maintaining and documenting the storage and destruction of the organization's documents and records. Much of this document was adopted directly from the American Institute of Certified Public Accountants (AICPA) toolkit for non-profit associations.

Definitions

1. None

Requirements

1. **Data Privacy:** Members of SLRC provide personal contact and limited emergency medical information with the understanding that it will be used for internal communication purposes only. Members sign an acknowledgement of the Club privacy policy during the registration. In addition, members of the Board of Directors utilize electronic SLRC data and communication tools which are covered under this policy. Elements of this policy include:
 - a. Rower contact information will be used for internal communication purposes only and not included on public rosters. Effort will be made to limit distribution to official Club officers or volunteers (i.e. BCC on emails, etc.)
 - b. Rower emergency medical information will be shared with coaches and, in the case of junior rowers, chaperones of the events they are attending. Chaperones will be instructed to safeguard such information and return it to the head coach at the end of the specific event.
 - c. Access to personal information on shared or team drives will be limited to members of Board of Directors, respective team coaches and volunteers for the limited purpose of conducting official Club business. Access to such drives will be periodically reviewed and updated to restrict access. Site Administrators for SLRC managed systems will not access the team drives, data, email, etc. of other Members of the Board of Directors without their expressed written consent or a majority vote of the Board.

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Revision Letter: Rev 0

Date: June 21, 2019



- d. On limited occasions, minimal parent contact information may be shared with prospective members for the intent of facilitating transportation for junior rowers.

2. Document Retention and Destruction Expectations:

SLRC staff, volunteers, contractors, and Members of the Board of Directors are expected to honor the following rules:

- a. Paper or electronic documents indicated under the terms for retention in the following section will be transferred and maintained by the respective member of the Board of Directors;
- b. All other paper documents will be destroyed after three years;
- c. All other electronic documents will be deleted from all individual computers, data bases, networks, and back-up storage after one year or until no longer needed for business planning purposes;
- d. No paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation (check with legal counsel or the human resources department for any current or foreseen litigation if employees have not been notified); and
- e. No paper or electronic documents will be destroyed or deleted as required to comply with government auditing standards (Single Audit Act).
- f. The Club Secretary will issue a compliance reminder annually and document compliance with the expectations of this policy.

3. Retention Requirements:

Type of Document	Minimum Requirement
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank statements	3 years
Checks (for important payments and purchases)	Permanently
Contracts, mortgages, notes, and leases (expired)	7 years
Contracts (still in effect)	Contract period
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Correspondence (with members, customers and vendors)	2 years

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Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	2 years
Expense analyses/expense distribution schedules	7 years
Year-end financial statements	Permanently
Insurance records, current accident reports, claims, policies, and so on (active and expired)	Permanently
Internal audit reports	3 years
Invoices	7 years
Bylaws and charter	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees) and members	7 years
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Trademark registrations and copyrights	Permanently
Withholding tax statements	7 years

References

Authority References

- SLRC By-Laws dated March 16, 2019

Other Relevant References

- AICPA Inc. Sample Document Retention and Destruction Policy, 2010. (Permission granted to download and tailor or customize for internal use.)

Maintained By

SLRC Finance Committee

Approved By

Signature on File

SLRC Treasurer

Signature on File

SLRC President