

Document Retention Policy

The corporate information of Palmetto Curling Club (hereby known as “PCC”) is important to how it conducts business.

Palmetto Curling Club must retain certain records as they contain information that:

- Serves as PCC’s corporate memory;
- Has enduring business value (for example, it provides a record of a business transaction, evidences PCC’s rights or obligations, protects PCC’s legal interests or ensures operational continuity); or,
- Must be kept to satisfy legal, accounting, or other regulatory requirements.

Palmetto Curling Club prohibits the inappropriate destruction of any records, files, documents, samples, and other forms of information. This policy is in accordance with the Sarbanes-Oxley Act of 2002, under which it is a crime to change, conceal, falsify, or destroy any record with the intent to impede or obstruct any official or government proceeding. Therefore, this policy is part of a company-wide system for the review, retention, and destruction of records PCC creates or receives in connection with the business it conducts.

Confidential Information Belonging to Others

Any confidential information that an employee or volunteer may have obtained from a source outside of PCC, such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by PCC. Unsolicited confidential information submitted to PCC should be refused, returned to the sender where possible, and deleted, if received via the internet.

Responsibility of All Employees or Volunteers

Palmetto Curling Club strives to comply with the laws, rules, and regulations that govern it and with recognized compliance practices. All company employees or volunteers must comply with this policy, the Records Retention Schedule, and any litigation hold communications. Failure to do so may subject PCC to serious civil and/or criminal liability. An employee or volunteer’s failure to comply with this policy may result in disciplinary sanctions, including suspension or termination.

Reporting Policy Violations

Palmetto Curling Club is committed to enforcing this policy as it applies to all forms of records. The effectiveness of PCC’s efforts, however, depends largely on employees or volunteers. If you feel that you or someone else may have violated this policy, you should report the incident immediately. If employees or volunteers do not report inappropriate conduct, PCC may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action. No one will be subject to and PCC prohibits, any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations.

Storage

PCC’s records must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to PCC’s business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

Destruction

Palmetto Curling Club’s Treasurer is responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records must be conducted by shredding if possible. Non-confidential records may be destroyed by recycling.

Litigation Holds and Other Special Situations

Palmetto Curling Club requires all employees or volunteers to comply fully with its published records retention schedule and procedures as provided in this policy. All employees or volunteers should note the following general exception to any stated destruction schedule: If you believe, or PCC's attorney informs you, that PCC records are relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails, until PCC's attorney determines those records are no longer needed. This exception is referred to as a litigation hold or legal hold, replaces any previously or subsequently established destruction schedule for those records.

Internal Review and Policy Audits

Palmetto Curling Club's Treasurer or Executive Board will periodically review this policy and its procedures with legal counsel to ensure PCC is in full compliance with relevant new or amended regulations. Additionally, PCC will regularly audit files and computer hard drives to ensure compliance with this policy.

APPENDIX**RECORD RETENTION SCHEDULE**

Occasionally Palmetto Curling Club establishes retention or destruction schedules or procedures for specific categories of records. This is done to ensure legal compliance and accomplish other objectives. Avoid retaining a record if there is no business reason for doing so. The following list may be revised as needed by the Executive Board.

RECORD	RETENTION PERIOD
Personnel Records	
Donor records and acknowledgement letters	7 years
EEO-1 Reports (Employer Information Report)	Filed annually with the EEOC and the Department of Labor, Office of Federal Contract Compliance Programs, most recent kept on file
Records relating to background checks on employees	5 years from when the background check is conducted
Personnel or employment records [made or kept by a contractor or subcontractor with less than 150 employees or less than \$150,000 in federal government contracts]	1 year from the date the record was made or personnel action was taken, whichever is later
Corporate Records	
Articles of Incorporation, Bylaws, Corporate Seal	Permanent
Annual corporate filings and reports to secretary of state and attorney general	Permanent
Board policies, resolutions, meeting minutes, and committee meeting minutes	Permanent
Contracts	Permanent if current (7 years if expired)
Construction documents	Permanent
Emails (business related)	3 years
Fixed Asset Records	Permanent
IRS Form 1023 (Application for charitable and/or tax-exempt status)	Permanent
IRS Determination Letter	Permanent
Sales and purchase records	3 years
State sales tax exemption documents	Permanent
Resolutions	Permanent
Accounting and Finance	
Accounts Payable and Receivables ledgers and schedules	7 years

Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled checks, deposit slips	7 years
Business expense records	7 years
Cash receipts	3 years
Check registers	Permanent
Electronic fund transfer documents	7 years
Invoices	7 years
Petty cash vouchers	3 years
Tax Records	
Annual tax filing for the organization (IRS Form 990 in the US)	[Permanent/7 years]
Filings of fees paid to professionals (IRS Form 1099 in the US)	7 years
Payroll tax withholdings	7 years
Earnings records	7 years
Payroll tax returns	7 years
State unemployment tax records	Permanent
Legal Records	
Leases	6 years after expiration
Real estate documents (including loan and mortgage contracts, deeds)	Permanent