

DATA RETENTION POLICY AND PROCEDURE

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DATA RETENTION POLICY AND PROCEDURE

1. Purpose

The purpose of this Data Retention Policy is to ensure that personal data collected, stored, and processed by ITEC Ltd is retained only for as long as necessary to fulfill the purposes for which it was collected, in accordance with data protection laws and good information governance practices.

2. Scope

This policy applies to:

- All employees, contractors, and third-party service providers who handle personal data on behalf of ITEC Ltd.
- All forms of personal data (electronic, paper-based, or otherwise).

3. Policy Statement

ITEC Ltd is committed to ensuring personal data is:

- Retained only for as long as necessary for the specific purpose it was collected.
- Securely disposed of or anonymized when no longer needed.
- Reviewed periodically to confirm continued necessity and compliance.

4. Legal and Business Retention Requirements

Personal data shall be retained based on:

- Statutory or regulatory requirements (e.g., tax, employment, or financial laws).
- Contractual obligations.
- Legitimate business needs.

Where retention periods are not prescribed by law, ITEC Ltd will determine reasonable periods based on operational necessity and data minimization principles.

5. Data Retention Schedule

Category of Data	Purpose	Retention Period	Disposal Method
Employee records	HR management, payroll, legal compliance	6 years after leaving	Secure deletion/shredding
Client records	Service delivery, legal compliance	1 years after service ends	Secure deletion/anonymization
Financial and accounting records	Auditing and tax reporting	7 years	Secure deletion
CCTV footage	Security and incident investigation	30 days unless required for investigation	Automatic overwrite
Recruitment records (unsuccessful candidates)	Hiring process only	12 months	Secure deletion
Consent records	Proof of consent for processing activities	Duration of processing + 2 years	Secure deletion

6. Review and Disposal Procedure

1. **Data Review:** Departments must review personal data annually (or as specified) to identify records that have reached the end of their retention period.
2. **Authorization for Disposal:** Disposal of personal data must be authorized by the Data Protection Officer (DPO) or relevant data owner.
3. **Secure Disposal:** Data must be destroyed or anonymized using approved secure methods (e.g., shredding paper files, wiping digital storage).
4. **Record of Disposal:** Maintain a log of data disposals, including description, date, and method used.

7. Responsibilities

- **Data Protection Officer (DPO):** Oversees compliance, approves retention schedules, and monitors disposal activities.
- **Department Heads:** Ensure their teams comply with this policy and conduct regular reviews.
- **Employees:** Follow procedures when handling, storing, or deleting personal data.

8. Policy Review

This policy shall be reviewed annually or whenever changes in legal, regulatory, or operational requirements occur.



9. Related Documents

- Data Protection Policy
- Security Policy
- Privacy Notice
- Data Breach Response Procedure

10. Policy Review

This policy will be reviewed annually and updated as needed to align with evolving technologies and compliance requirements.

SIGNED BY ITEC LTD

Name: TWAGIRAMUNGU Serge

Title: Managing Director

Effective Date: April 30,2025

Review Date: April 30,2025