

Policy on Data Retention, Storage and Disposal

1. Purpose

This policy ensures that the organization retains records for appropriate periods to:

- Comply with the **Canada Not-for-profit Corporations Act** and other applicable laws.
- Protect personal information.
- Support operational efficiency and accountability.
- Safely dispose of records when no longer required.

2. Scope

Applies to all staff, volunteers, and contractors handling organizational records in both paper and electronic formats.

3. Categories & Retention Periods

Record Type	Retention Period	Legal/Operational Basis
Corporate Records (articles, by-laws, minutes, resolutions, debt obligations)	Permanent	Governance requirement Required by Canada Not-for-profit Corporations Act
Board & Committee Minutes	Permanent	Governance requirement
Financial Records (general ledgers, audited statements, tax filings)	7 years	Governance Requirement, CRA requirements
Donor, Grant Records (agreements, receipts, correspondence)	7 years after last donation	Finance requirements, CRA
Employee/ Facilitator /Contractor Records (contracts, payroll, payments, performance)	7 years after termination	Employment standards & CRA
Volunteer Records (board/ committee members, terms, agreements, screening checks)	3 years after departure	Risk management

Program Records (classes offered, locations, reports, participant data)	5 years after program ends	Operational need
Membership Records (data, name, address, email, phone information)	3 years	Operational need
Personal Information used in decisions	Minimum 2 years	Required Governance
Electronic Communications (emails, digital files)	2–3 years unless needed longer, transitory/non business emails deleted in year	Best practice

4. Storage & Security

- Paper records stored in Seniors College space as determined by the Executive.
- Electronic records maintained and may be restricted to authorized personnel as determined by the Executive.
- Cloud storage providers must comply with Canadian privacy standards.

5. Disposal

- Paper records shredded.
- Electronic records permanently deleted using appropriate data-wiping tools.
- Disposal logged and approved by the executive.

6. Review & Updates

This policy will be reviewed every **two years** to ensure compliance with evolving laws and best practices.

Note: Canadian not-for-profits must keep corporate records permanently, financial and donor records for at least 7 years, and personal information for a minimum of 2 years after use. Destruction is essential to comply with privacy obligations.

