

POLICY AND PROCEDURE

POLICY TITLE: Records and Information Management Policy	NUMBER: 2012-01	PAGE: 1 of 5
APPROVED BY: Zone 7 Board	REVISION:	EFFECTIVE DATE: March 12, 2012

1. PURPOSE

The Purpose of the Records and Information Management (RIM) Standard is to define the requirements for managing the records and information assets of Zone 7 in compliance with regulatory, legal and business requirements in the most efficient and effective manner.

2. SCOPE

This Standard applies to employees, temporary workers and contractors of Zone 7 and provides the information governance for maintaining, retaining, and disposing of records and information. This Standard applies to records and information in all formats and every medium including electronic information.

3. DEFINITIONS

Reference terms used in this Standard are found in the RIM Program Glossary.

4. STANDARD STATEMENT

This Standard identifies the requirements relating to the creation, retention, and disposition of records and information. Records and information are ZONE 7 assets that are created and received in the course of doing business. As assets of the company, the company retains ownership of all records and information and reserves the right to access and disclose records and information from any of its systems. Records and information, including electronic communication, is subject to the requirements of this Standard and other information governance requirements.

Records and information include, but are not limited to, documents concerning the organization, business functions, policies, decisions, Standards, operations, and internal or external transactions that are created and retained for business or legal reasons. Accordingly, records and information are to be created, valued, protected, managed and disposed in compliance with applicable laws, regulations and this Standard and other ZONE 7 policies and Standards. Records and information determined to be confidential and proprietary are to be protected from unauthorized access and disclosure.

Records and information is any form of recorded information created, maintained or received by ZONE 7 in the conduct of its business operations and activities for use at a later time, including but not limited to paper, email, electronic, structured data, unstructured data, microfilm, microfiche, photograph, map, computer media, video, or other recorded information. The Records Retention Schedule (RRS) serves as an information governance document listing the types of records that must be retained by ZONE 7. Records and information are required to be retained according to the time periods set forth in the RRS.

Not all documents received or generated by ZONE 7 are required to be retained. These are considered "Convenience Information". Convenience Information does not further ZONE 7's business needs if it is maintained. Convenience Information should be kept only for the period of time in which it is active and useful so long as it is not subject to a Legal Hold.

The objectives of this Standard are:

- 4.1 To properly govern records and information assets;
- 4.2 To accurately create records and information reflecting the business activities of Zone 7;
- 4.3 To properly retain and manage records and information in compliance with regulations, laws and business requirements; and
- 4.4 To suspend the destruction or deletion of any information pursuant to the Records Retention Schedule (RRS) and to preserve any information determined to be the subject of a Legal Hold, Tax Hold or Audit until instructed otherwise by the individual responsible for issuing the Legal Hold, Tax Hold, or Audit Notice.

5. ROLES AND RESPONSIBILITIES

Role	Responsibility
Employees	Responsible for complying with the requirements of this Standard and reporting any violations.

Directors/Managers/Supervisors	Responsible for ensuring that their employees are trained on and understand the requirements of this Standard. Responsible for ensuring that records and information for their area are properly managed according to this Standard and the RRS.
Executive Assistant RIM Program Coordinator	Responsible for documenting the requirements of managing Zone 7 records and information assets and making the requirements available for the employees.

6. PROVISIONS

- 6.1 Records and information will be created, stored and managed with the appropriate classification that enables the protection as well as necessary access for future use.
- 6.2 Records and information are to be retained in accordance with the Records Retention Schedule (RRS) including the time that covers a Legal Hold. When information completes its retention period, it shall be deleted or disposed of in compliance with ZONE 7's RIM Standards.
- 6.3 Email messages and attachments that are determined to be records of the company according to the subject categories of the RRS shall be managed as records according to the RRS.
- 6.3.1 Zone 7 reserves the right to monitor the contents of email messages for any reason.
- 6.3.2 Employees are prohibited from participating in chain email letters.
- 6.3.3 Do not use email for engaging in illegal, fraudulent, or malicious activities.
- 6.3.4 Email cannot be used to solicit for personal outside business ventures.
- 6.3.5 Refrain from using profanity, obscenities, derogatory remarks and other inappropriate or offensive language in email.
- 6.3.6 Do not create, forward or send messages that a reasonable person would consider defamatory, harassing or explicitly sexual.

- 6.3.7 Do not create, forward or send messages or images that would likely offend on the basis of race, gender, national origin, sexual orientation, religion, political beliefs or disability.
- 6.3.8 Confidential information may only be sent by the person responsible for the information to person(s) with a need to know.
- 6.3.9 Confidential information must be encrypted prior to sending outside the company network system.
- 6.4 Records and information management requirements are to be applied consistently and regularly.
- 6.5 Records and information no longer considered active should be transferred to the designated archive for long-term storage to fulfill retention requirements.
- 6.6 Records and information transferred to the archive must be available for future business, litigation, and investigations as necessary.
- 6.7 When an employee leaves ZONE 7, the supervisor or manager is responsible for managing the records and information in their possession according to RIM Standards.
- 6.8 Records and information relevant to litigation, an investigation or an audit and subject to a Legal Hold are to be retained and preserved until further notice from the issuing Department, regardless of the retention period set forth in the RRS.

Records subject to a Legal Hold, Tax Hold, or an audit that are no longer required for business purposes may be transferred to an appropriate archive for preservation in coordination with the issuing department.
- 6.9 Records and information designated as "vital" are to be protected in a manner that establishes the priority of recovery of the data in a timely manner following a disaster or system disruption.
- 6.10 Records and information are to be protected according to their sensitivity classification as defined in Information Security Policies and other ZONE 7 policies and in a manner that prevents unauthorized disclosures.
- 6.11 Disaster recovery backup tapes are exact copies of an operating system, associated application and data. Disaster recovery backup tapes are created solely for the purpose of recovering data in the event of a disaster and are not subject to the requirements of the RRS.

6.12 Records and information created or received in the course of conducting business are to be accurate and complete and are considered property of ZONE 7.

7. REFERENCES

Records Retention Schedule
Information Security Policy

HISTORY

Date	Action	Resolution
March 21, 2012	Adopted	12-4178