International Fund
for Public Interest Media

DATA RETENTION POLICY

Version:	1.0
Policy Owner:	General Counsel
Date of Audit and Finance Committee Approval:	April 2025
Review Schedule:	Every two (2) years
Most Recent Review:	April 2025
Next Review:	April 2027

1. Introduction

The Data Retention Policy establishes the framework for managing the retention, storage, and disposal of Documents within the International Fund. The objective is to ensure compliance with legal, regulatory, and operational requirements while safeguarding sensitive information, maintaining data integrity and institutional knowledge.

2. Scope of Policy

This policy applies to all persons holding appointments to an International Fund position, regardless of the duration or nature of their appointment (i.e., full-time, part-time, fixed-term, or temporary), and duty station or grade, as well as to others working for the International Fund under other types of contractual arrangements, including consultants and interns ("Employees").

It governs the retention and disposal of all Documents generated, received, or maintained by the International Fund and its Employees, ensuring that information is retained for appropriate periods and disposed of securely when no longer required. Compliance with this policy is mandatory for all relevant personnel.

3. Compliance and Review

Employees have a continuing obligation to familiarize themselves with the provisions of this Policy and any revisions thereto. If an Employee is unsure as to the proper course of action in any matter related to their conduct or the conduct of others, they should seek the advice of their Manager or Legal.

Non-compliance with this policy may result in disciplinary action.

4. Definitions

Document: *Any recorded information*, regardless of format, including paper records, emails, digital files, and databases.

Personal Identifiable Information (PII): *Any information* relating to an identified or identifiable natural person, including names, addresses, identification numbers, and financial details.

Retention Period: *The duration* for which a document must be retained in accordance with this Policy.

Secure Disposal: *The process* of permanently destroying records to prevent unauthorized access or reconstruction.

5. Policy Statement and Principles

5.1. General Principles

The International Fund should retain Documents for the required period as per **Attachment A**. PII shall be protected and retained only for the purposes for which they were collected and processed and no longer than necessary for such purpose or as required by applicable laws. Further details on the processing of PII will be provided to data subjects in Privacy Notices.

Data retention schedules indicated in Attachment A are informed by legal, regulatory, and operational requirements. At the end of the Retention Period**,** documents shall be securely disposed of unless an extension is justified by business, legal, or compliance requirements. Retention periods may be subject to updates due to changes in legal or business requirements; these updates will be communicated by Legal.

5.2. Data Access and Security

Documents must be retained in accordance with Attachment A and in the location designated in IFPIM's Internal Guidelines for Documents Management.

The Owners are responsible for ensuring restricted access to Documents, in accordance with Attachment A.

Access to retained documents is granted strictly on a need-to-know basis and is subject to approval by the relevant Folder owner (as outlined in **Attachment A)**. Digital records containing PII, financial, or other sensitive information must be stored securely in accordance with the International Fund's IT Security Policy.

Physical documents must be stored in locked and controlled-access facilities. Periodic reviews of data access permissions must be conducted by General Counsel and Finance Director to ensure compliance and prevent unauthorized access.

Data security measures, including multi-factor authentication and audit logs, must be implemented to track access and modifications to sensitive records.

5.3. Data Disposal

Documents must be destroyed securely when no longer needed using appropriate methods:

- Paper records: Shredding.
- Electronic records: Secure deletion or data wiping using industry-standard methods.
- Storage devices: if required, physical destruction of hard drives or removable media.

Document owners must oversee the destruction process to ensure compliance with this policy.

With respect to email communications, this policy establishes a maximum data retention period of two years for emails sent after the approval date of this policy. Every other year after the approval of this policy, IFPIM employees will be notified with a three month notice that emails exchanged over the past two years will be deleted automatically, allowing to review and save any emails deemed necessary for organizational purposes and compliance with this policy. This process aims to balance data minimization with the preservation of essential records.

With respect to messages exchanged within internal chats, this policy establishes a one-year retention period. Beyond the data retention period, chat messages will be automatically deleted. This annual deletion cycle is designed to manage the volume of ephemeral communications and maintain efficient storage.

5.4. Exceptions to the Policy

If a document is subject to litigation, investigation, or audit, it must be retained until formal resolution, regardless of its original retention period. The General Counsel retains the authority to issue a legal hold, requiring staff to preserve specific emails or records beyond the standard retention period. Upon issuance of a legal hold, staff will be promptly notified and instructed to suspend any actions that would result in the deletion or alteration of the designated emails or records. This legal hold will remain in effect until explicitly lifted by the General Counsel.

Requests for extensions beyond the defined retention period must be submitted to the General Counsel by the data owner, specifying the reason for retention and an estimated review date.

Any deviation from this policy must be documented (at least via email) and approved by the General Counsel.

Attachment A: Document Retention Schedule

Commercial Documents

Document type	Retention Period	Owner	Access [1]	PII
Contract or agreement concluded within the framework of a commercial relationship, commercial correspondence (paper or electronic)	5 years from contract term	General Counsel (GC)	Finance, Legal, and contract business owner	Yes
Insurance policy	2 years from termination of the contract	Director of Finance (DoF)	Finance, Legal, HR (and external brokers)	Yes
Document relating to intellectual property	5 years from the end of protection	GC	Legal & Executive team	No
Lawyer's file	5 years from the end of the mandate	GC	Legal	Yes

Accounting Documents

Document type	Retention Period	Owner	Access	PII
Accounting book and register: journal, general ledger, inventory book, etc.	10 years from the end of the financial year	DoF	Finance	Yes
Bank document (check stub, bank statement, etc.)	5 years	DoF	Finance	Yes
Supporting document: purchase order, delivery or receipt, customer and supplier invoice, records of	10 years from the end of the financial year	DoF	Finance	Yes

[1] Access may be extended on a strict need to know basis, at the Owner's discretion. While assessing the need for potential access extensions, the Owner should take into account Personal Data implications and other risks associated with an extended access right and can reach out to Legal for advice.

Document type	Retention Period	Owner	Access	PII
procurement process and decision making, etc.				
Annual Budget	7 years	DoF	Finance	No

Tax and Customs Documents

Type of tax	Retention Period	Owner	Access	PII
All applicable tax reports and other tax related documents and correspondence	6 years	DoF	Finance, Legal	No
Customs declaration	3 years	DoF	Finance	No

Corporate Document

Document type	Retention Period	Owner	Access	PII
Annual accounts (balance sheet, income statement, annex, etc.)	10 years from the end of the financial year	DoF	Finance, Executive Team	No
Annual Reports	Until loss of legal personality	Director of Partnerships and Government Affairs	Resource Mobilization, Finance	Yes
Donor specific reports (as applicable)	In accordance with the contribution agreement	Director of Partnerships and Government Affairs	Resource Mobilization, Finance	Yes
Statutes, bylaws and any amendments thereto		GC		Yes

Document type	Retention Period	Owner	Access	PII
Policies (including each previous version of the Policies)	5 years from the loss of legal personality		Legal, Board, and Executive Team	No
Register of minutes of board of directors, board committees and council (including attendance record)				Yes
Register of minutes of internal committees' meetings (for committees with Terms of Reference)	5 years	Committee Chair	As defined in the ToRs	Yes
Documents recording delegation of signature, power of attorney	3 fiscal years	GC	Executive Team	Yes
International Fund for Public Interest Media's Auditors' report	10 years	DoF	Finance, CEO, Deputy CEO, Legal	No

Personnel management & recruitment

Document type	Retention Period	Owner	Access	PII
Recruitment, Hiring and Job Placement Records (not hired) - Employment applications	2 years after application (unless request to be removed earlier) Retention beyond the initial retention period for a talent pool is subject to the data subject's consent.	HR Team	HR team and hiring team	Yes

Document type	Retention Period	Owner	Access	PII
Recruitment, Hiring, and Job Placement Records (hired) Job applications; Resumes; Other job inquiries; Employment referral records; Applicant identification records; Help wanted ads; Opportunities for training, promotion or overtime; Job opening notices; Employment testing results	4 years from date of departure	HR Team	HR team and hiring team	Yes
Employee Personnel Files Disciplinary notices; Promotions and demotions; Performance evaluations; Discharge, layoff, transfer and recall files; Training and testing files	4 years from date of departure	HR Team	HR Team and Relevant Line Managers	Yes
Pay slip (paper or electronic duplicate)	The duplicate of the pay slip is kept for 5 years by the employer after the employee's departure.	HR team	HR team and designated finance officer	Yes
Single personnel register	5 years from the employee's departure	HR Team	HR Team	Yes
Document concerning employment contracts, salaries, bonuses, compensation, final settlements, retirement plans.	5 years	HR Team	HR Teams (and external/in-house lawyers as relevant/needed)	Yes
Document relating to contributions related to employee benefits	3 years	HR Team & Finance Team	HR Team & Finance Team	Yes

Document type	Retention Period	Owner	Access	PII
Recording of working days of employees under a flat-rate agreement	3 years	HR Team	HR Team & Manager	Yes
Recording of employee hours, on-call hours and their compensation	1 year	HR Team	HR Team & Manager	Yes
Declaration of work accident to the primary health insurance fund	5 years	HR Team	HR Team (may be shared with external providers and social security)	Yes
Employee Health Administration Work doctor visit and follow up (if needed), notifications of medical leave (sick leave, maternity leave, etc.)	5 years after departure of employee	HR Team	HR Team	Yes

General Documents

Document type	Retention Period	Owner	Access	PII
Miscellaneous business records General correspondence and records not related to other categories and that are relevant to keep.	Any documents falling under a defined category in this annex are subject to the retention period of that category. For all other miscellaneous business records, the retention period is 2 years.	Individual record owner	On a need to know basis.	Yes
Administration references Catalogs, Newsletters, Publications, Periodicals,	1 year	Communications Team	Unrestricted	Yes

Document type	Retention Period	Owner	Access	PII
Newspapers				
Communications archives Photos, posters, artifacts, gifts, press releases, newspaper/press articles regarding organization and/or founders. Media relations, videos, interviews	Until loss of legal personality.	Communications Team	Unrestricted	Yes

Grant, Project, and Investment Documents

Document type	Retention Period	Owner	Access	PII
Denied Grant Application and Assessment Documents Includes Inquiries, unsolicited proposals, assessment documents (full grant assessment, financial analysis, risk assessment, concept notes, grant budget, grant record, etc.), documents related to the applicant's organization (financial records, organizational documents, and compliance documents, Know Your Customer Records)	4 years from denial of grant application	Grant Ops	Grant Ops and Regional Teams	Yes
Approved Grant Application and Assessment Documents All application documents (as described above), concept notes, financial analysis, risk assessments, full grant assessments, grant budget, grant record, and all other documents (such as financial records and other organizational documentation) related to the assessment and	8 years after completion of grant period	Grant Ops	Grant Ops, Regional Teams, and GLIC Members	Yes

Document type	Retention Period	Owner	Access	PII
selection of a particular Grant, as documented in the central grant management system.				
Grant Agreements and Contracts Signed agreements and amendments	8 years after the end of completion of grant period	Grant Ops	Grant Ops, GC, and DoF	Yes
Monitoring and Evaluation Reports Budget, narrative reporting, indicator data, etc.	7 years after completion of grant period	Grant Ops	WWU, Grant Ops, and Regional Teams	Yes
Know Your Customer records Grantee identity verification information and KYC data and analysis	2 years after completion of grant	Grant Ops	Grant Ops	Yes