

1. PURPOSE AND SCOPE

TSI GROUP is hereinafter referred to as "the company" which includes TeDan Surgical Innovations Inc., West Coast Surgical Innovations LLC, Axxess Surgical Innovations LLC, and TeDan Surgical Innovations GmbH are covered by the scope of this policy.

The need to retain data varies widely with the type of data. Some data can be immediately deleted, and some must be retained until reasonable potential for future need no longer exists. Since this can be somewhat subjective, a retention policy is important to ensure that the company's guidelines on retention are consistently applied throughout the organisation.

The purpose of this policy is to specify the company's guidelines for retaining different types of data.

The scope of this policy covers all company data stored in physical form or on company-owned, company-leased, and otherwise company-provided systems and media, regardless of location.

Note that the need to retain certain information can be mandated by local law, industry regulations (ie. 21CFR820, Medical Device Regulation 2017/745 (MDR), ISO 13485, MDSAP Section 11; Reference TSI Records Control Procedure 402) and will comply with EU General Data Protection Regulation (GDPR) and the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003. Where this policy differs from applicable regulations, the policy specified in the regulations will apply.

2. RESPONSIBILITIES

The IT Manager is responsible for the infrastructure and digital wellbeing of the data in question from a technology standpoint.

Each department is responsible for their own data management per the guidelines below.

3. POLICY

The company does not operate a "save everything" approach and will only record the minimum data required. However, some data must be retained to service contracts, operate the business, protect the company's interests and generally conform to good business practices. Some reasons for data retention include in the table on the next page.

Description	Retention period	Justification	Medium	Disposal method
Company Records				
Company accounts, book-keeping and accounting records.	Minimum: 3 years Maximum: life of company	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Company information: Shareholder resolutions, Articles of Association, shareholders' register, board resolutions, standing orders, boards and shareholders' meetings minutes, supervisory board's rules of procedure, supervisory council's rules of procedure	Minimum: 10 years from the date of creation or meeting Maximum: life of the company	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Directors' service contracts, employee contracts and statement of terms (including ex pat contracts, work permits/visas)	Minimum: 6 years after termination of contract	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
DMR/MDF	Per SOP 402	Legal obligation	Electronic & Paper	Per SOP 402
Other Device Related Records	Per SOP 402	Legal obligation	Electronic & Paper	Per SOP 402
Quality and Regulatory Systems	Per SOP 402	Legal Obligation	Electronic & Paper	Per SOP 402
Records and documents of the dissolved legal entity	Minimum: 20 years from dissolution date	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Tax Records				
Corporation tax	Minimum: 6 years from relevant tax period.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Payroll records (wages, tax (PAYE) and social security (National Insurance) records, payslips, overtime compensation, bonuses, expenses, benefits in kind) for the purposes of tax returns	Minimum: 6 years from relevant tax period. Maximum: 10 years from relevant tax period.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
VAT and customs records (including tax and duty)	Minimum: 6 years from relevant tax period. Maximum: 10 years from relevant tax period.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Stamp duty/property taxes	Minimum: 6 years from relevant tax period. Maximum: 10 years from relevant tax period.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Insurance				
Policy documentation	Minimum: 6 years Maximum: 40 years (for employer's liability certificates	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding

Reports relating to noise or workplace hazardous substances or other potential exposures	Minimum: 40 years	Legal obligation	Electronic & Paper	N/A
Intellectual Property & Legal				
Records including patent and trade mark registrations	Minimum: 6 years after the IP right ceases Maximum: 40 years	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Contracts (including non-disclosure agreements)	Minimum: 6 years after the contract ceases or (if later) unless specified in contracts per SOP 402 6 years after the last obligation (eg a warranty) ceases under the contract.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Deeds (including property & lease agreements)	Minimum: 12 years after termination/transfer/release or sale with no future obligations or (if later) 12 years after the last obligation ceases under the agreement	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
Terms and conditions of sale or purchase	Minimum: 6 years after the contract ceases or (if later) 6 years after the last obligation ceases under the contract.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding
CCTV/camera recordings	30 days (or such period as is necessary to fulfil the purpose of such a recording)	Legitimate interest	Electronic	Automatic electronic deletion / Secure hardware disposal
Employees				
Employment contracts and associated records (application forms, CVs references, written particulars of employment, changes to terms and conditions, training records, Emergency contacts / next of kin records)	Minimum: 6 years from termination of contract except for Job Applications, Training Records, and external certifications which fall under SOP 402.	Legitimate interest	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Disciplinary records, Attendance records, Appraisal / performance review records	Minimum: 6 years from the end of the tax year to which the record relates	Legitimate interest	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Pension records	Minimum: 10 years Maximum: Lifetime	Legitimate interest	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal

Parental leave and Maternity records	Minimum: 3 years from the end of the tax year in which the parental leave / maternity pay period ends. Maximum: 6 years from the end of the tax year in which the parental leave / maternity pay period ends.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Probation reviews and rejected job applicant records	Minimum: 6 months after notification of unsuccessful applicant	Legitimate interest	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
National minimum wage records	Minimum: 3 years from the end of the tax year in which the pay reference period ends. Maximum: 6 years from the end of the tax year in which the pay reference period ends.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Identification documents	Minimum: 2 years from termination of contract (foreign nationals) Maximum: 6 years from termination of contract	Legitimate interest (Legal obligation for foreign nationals)	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Supplier Data				
Supplier contracts	Minimum: Throughout the duration of the working relationship. Except for Approved Supplier List and files which are under SOP 402 for 15 years. Maximum: 3 years after working relationship ceased unless ATEX, in which case 10 years.	Contract	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Supplier contact details	Minimum: Throughout the duration of the working relationship. Maximum: 1 year after working relationship ceased.	Contract	Electronic & Paper	Electronic deletion / Secure hardware disposal
Customer Data				
Customer contracts	Minimum: Throughout the duration of the contract / working relationship or per SOP 402 which indicates 10 years for Quotes, Distribution Agreements, Price lists, Sales Orders, Invoices, and Confirmations. Maximum: 3 years after contract expires / working relationship ends.	Contract	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal

Customer contact details	Minimum: Throughout the duration of the working relationship. Maximum: 1 year after contract expires / working relationship ends.	Contract	Electronic & Paper	Electronic deletion / Secure hardware disposal
Customer consumption/device data	Minimum: 5 years, unless agreed otherwise Maximum: 15 years, unless agreed otherwise	Contract	Electronic & Paper	Electronic deletion / Secure hardware disposal
Marketing lists	Minimum: Throughout the duration of the working relationship which as defined in the Opt-In disclosures expires within two years of re-engagement. Maximum: 1 year after working relationship ends.	Legitimate interest	Electronic & Paper	Electronic deletion / Secure hardware disposal
Customer supplied materials/information, outside of the above	Minimum: Throughout the duration of the working relationship unless we have signed approval for further use. Maximum: 1 year after working relationship ceased.	Contract	Electronic & Paper	Electronic file deletion / Paper file shredding / Return to customer / Secure hardware disposal
Health and Safety				
Accident records (including near misses, accident reports, traffic incidents)	Minimum: 3 years from the date of the last entry made in the record.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Eye tests for users of display screen equipment	Minimum: 3 years after termination of employment.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Health surveillance related to asbestos	Minimum: 40 years from the date of the last entry made in the record.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Health surveillance related to substances that are hazardous to health	Minimum: 40 years from the date of the last entry made in the record.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Health surveillance related to ionising radiation	Minimum: 30 years from the date of the last entry made in the record or until subject reaches the age of 75.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Hearing tests for employees exposed to noise above an exposure limit value	Minimum: 3 years after termination of employment.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal

Records of consultations with safety representative and committees	Minimum: 6 years from the termination of the company.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Records of tests and examinations of control systems and protective equipment related to substances that are hazardous to health	Minimum: 5 years from the date on which the tests were carried out.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Other employee health records (e.g data necessary for emergency medical care, individual reintegration plans, individual treatment agreements, degree of incapacity for work, required workplace adaptations, eye tests, hearing tests)	Minimum: 3 years after termination of employment.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Environmental				
Environmental incidents/complaints	Minimum: 10 years after remediation of the incident/resolution of the complaint.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Pest Control and Maintenance records	Minimum: Per SOP 402 – 15 years	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Names and addresses of the clients/buyers of chemicals or environmentally dangerous substances (and preparations for these) which a company has manufactured, imported or supplied	Minimum: 10 years from the date the manufacturer, importer, downstream user and distributor last manufactured, imported, supplied or used the substance or preparation.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Waste transfer notes for controlled waste	Minimum: 2 years from the date of transfer. Maximum: 6 years from the date of transfer.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal
Hazardous waste carrier consignment notes.	Minimum: 1 year from the date of delivery of the waste to its destination.	Legal obligation	Electronic & Paper	Electronic file deletion / Paper file shredding / Secure hardware disposal

Note: Maximum retention period is the same as the minimum unless otherwise stated.

4. DISPOSAL METHODS

Automatic electronic deletion – an automatic service to prune data in accordance with the data retention periods.

Electronic file deletion – deletion of file from all electronic storage facilities. Removal from backups will take longer, due to backup retention policies.

Paper file shredding – cross paper shredding by a third-party, onsite and under supervision.

Return to customer – the option to return to the customer, instead of disposal.

Secure hardware disposal – where hardware (e.g. electronic storage device) disposal is required, this will be logged in a register, secured until disposal, and then securely destroyed onsite, under supervision.

5. ENFORCEMENT

This policy will be enforced by the IT Manager and/or Management Team. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company will report a data breach to the Information Commissioners Office and may also report such activities to the applicable authorities.

REVISION HISTORY

Revision	Description
01	Initial document creation