RECORDS MANAGEMENT AND DOCUMENT RETENTION POLICY

JANUARY 2026

POLICY NUMBER: TMG-SEC-005
APPROVAL AUTHORITY: BOARD OF DIRECTORS

THE MAZI GROUP

1. PURPOSE

This Records Management and Document Retention Policy establishes standards for the creation, maintenance, retention, and disposal of business records across The Mazi Group and all its brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo. Proper records management ensures compliance with legal and regulatory requirements, supports business operations, protects company interests, and enables efficient information retrieval.

2. SCOPE

This policy applies to:

- All records created, received, or maintained by The Mazi Group and its subsidiaries
- All formats: paper documents, electronic files, emails, databases, images, audio/video recordings
- All employees, contractors, and third parties who create or manage company records
- All business functions and departments
- All geographic locations: United States, Canada, European Union, and Latin America

3. POLICY STATEMENT

The Mazi Group is committed to:

- Maintaining accurate, complete, and reliable business records
- Retaining records for periods required by law and business necessity
- Protecting records from unauthorized access, alteration, or destruction
- Disposing of records appropriately when retention periods expire
- Preserving records subject to litigation holds or regulatory investigations

4. RECORDS CLASSIFICATION

4.1 Record Categories

- **Vital Records:** Essential for business continuity and legal compliance; irreplaceable
- **Important Records:** Significant business value; difficult but not impossible to replace
- **Useful Records:** Operational value; easily replaceable
- **Non-Essential Records:** Temporary value; can be destroyed after immediate use

4.2 Confidentiality Classification

- **Confidential:** Highly sensitive; restricted access (trade secrets, personal data, financial)
- **Internal:** For internal use only; not for public disclosure
- **Public:** May be shared externally without restriction

5. RETENTION SCHEDULE

5.1 Corporate and Legal Records

Record Type	Retention Period
Articles of Incorporation, Bylaws	Permanent
Board Minutes and Resolutions	Permanent
Stock Records and Shareholder Agreements	Permanent
Contracts (executed)	10 years after expiration
Litigation Files	10 years after final resolution
Intellectual Property Records	Life of IP + 10 years
Insurance Policies	Permanent
Permits and Licenses	6 years after expiration

5.2 Financial Records

Record Type	Retention Period
Annual Financial Statements	Permanent
General Ledger	Permanent
Accounts Payable/Receivable	7 years
Bank Statements and Reconciliations	7 years
Tax Returns and Supporting Documents	7 years
Expense Reports	7 years

Invoices (customer and vendor)	7 years
Audit Reports	10 years

5.3 Human Resources Records

Record Type	Retention Period
Personnel Files (active employees)	Duration of employment
Personnel Files (terminated employees)	7 years after termination
Payroll Records	7 years
Benefits Records	7 years after plan termination
I-9 Forms	3 years after hire or 1 year after termination (whichever is later)
OSHA Records	5 years
Workers' Compensation Claims	10 years after resolution
Job Applications (not hired)	3 years

5.4 Product and Quality Records

Record Type	Retention Period
Product Formulations	Life of product + 10 years
Product Information Files (PIFs)	10 years after last batch
Batch Production Records	Product shelf life + 3 years
Quality Testing Results	Product shelf life + 3 years
Adverse Event Reports	10 years
Product Recall Records	10 years
Supplier Certifications	Duration of relationship + 5 years
Regulatory Submissions	Life of product + 10 years

5.5 Technology and Data Records

Record Type	Retention Period
Software Source Code	Life of software + 5 years
System Documentation	Life of system + 3 years
Security Logs	3 years
Data Processing Agreements	Duration + 7 years
Privacy Impact Assessments	7 years
AI Model Training Data	Life of model + 5 years
System Backup Tapes	Per backup rotation schedule

5.6 Marketing and Sales Records

Record Type	Retention Period
Customer Contracts	Duration + 7 years
Marketing Materials	3 years after last use
Advertising Substantiation	5 years after last use of claim
Customer Complaints	5 years
Sales Reports	7 years
Influencer Agreements	Duration + 5 years

5.7 Email and Electronic Communications

- Business emails: Retain based on content category (apply relevant retention period)
- Transitory emails (scheduling, logistics): May be deleted after immediate use
- Instant messages: Retain if they contain business decisions or records
- Voicemails: Retain if they contain business decisions or records

6. LITIGATION HOLD

6.1 Definition

A litigation hold (also called legal hold) suspends normal document retention and destruction practices when litigation is reasonably anticipated, pending, or ongoing.

6.2 Triggering Events

- Receipt of a complaint, subpoena, or government inquiry
- Threat of litigation from a third party
- Internal awareness of facts likely to lead to litigation
- Regulatory investigation

6.3 Litigation Hold Process

- Legal department issues written litigation hold notice
- Notice identifies scope of documents to be preserved
- Recipients must acknowledge receipt and compliance
- IT implements technical preservation measures
- Regular reminders issued during hold period
- Hold released only by Legal when matter concludes

> **Important:** Destruction of documents subject to a litigation hold may result in severe legal sanctions, including adverse inference instructions, monetary penalties, and criminal charges. When in doubt, preserve.

7. RECORDS STORAGE AND SECURITY

7.1 Physical Records

- Store in secure, climate-controlled facilities
- Restrict access to authorized personnel
- Maintain inventory and tracking systems
- Use approved off-site storage vendors for archived records
- Protect against fire, flood, and other hazards

7.2 Electronic Records

- Store on approved company systems only
- Apply appropriate access controls
- Encrypt sensitive data at rest and in transit
- Maintain regular backups per IT policies
- Ensure records remain accessible and readable over retention period

7.3 Cloud Storage

- Use only approved cloud service providers
- Ensure data residency requirements are met (especially for EU data)
- Verify provider security certifications
- Maintain ability to retrieve and export data

8. RECORDS DISPOSAL

8.1 Disposal Authorization

- Records may only be disposed of after retention period expires
- Verify no litigation hold applies
- Obtain approval from Records Manager or department head
- Document disposal in destruction log

8.2 Disposal Methods

Confidential Records

- Paper: Cross-cut shredding or certified destruction service
- Electronic: Secure deletion or physical destruction of media
- Certificate of destruction required for confidential records

Non-Confidential Records

- Paper: Recycling acceptable
- Electronic: Standard deletion

9. INTERNATIONAL CONSIDERATIONS

9.1 Data Protection Requirements

- GDPR (EU): Personal data retention limited to purpose; data subject rights
- CCPA/CPRA (California): Consumer rights regarding personal information
- PIPEDA (Canada): Retention limited to identified purposes
- Local laws may require shorter or longer retention for specific records

9.2 Cross-Border Transfers

- Records containing personal data subject to transfer restrictions
- Appropriate safeguards required (SCCs, adequacy decisions)
- Coordinate with Legal and Privacy for international records

10. ROLES AND RESPONSIBILITIES

10.1 Records Manager

- Oversee records management program
- Maintain retention schedule
- Coordinate disposal activities
- Provide training and guidance
- Conduct periodic audits

10.2 Department Heads

- Ensure compliance within their departments
- Identify records requiring special handling
- Approve disposal requests
- Support litigation hold implementation

10.3 All Employees

- Create and maintain accurate records
- Store records in approved locations
- Follow retention and disposal procedures

- Comply with litigation holds
- Report records management concerns

10.4 Legal Department

- Issue and manage litigation holds
- Advise on retention requirements
- Respond to legal discovery requests
- Review policy for legal compliance

10.5 IT Department

- Implement technical controls for records management
- Maintain backup and recovery systems
- Support litigation hold preservation
- Ensure secure disposal of electronic media

11. TRAINING

- All employees: Records management awareness training at hire and annually
- Department records coordinators: Enhanced training on procedures
- Legal and compliance: Litigation hold procedures
- Training records maintained per HR retention schedule

12. MONITORING AND AUDIT

- Annual review of retention schedule for legal and business changes
- Periodic audits of records management compliance
- Monitoring of disposal activities
- Reporting to management on program effectiveness

13. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-001: International Regulatory Compliance Policy
- TMG-SEC-002: Product Safety and Quality Control Policy

- TMG-SEC-016: Data Privacy Policy (GDPR, CCPA Compliance)
- TMG-SEC-017: Cybersecurity and IT Security Policy
- TMG-SEC-018: Customer Data Management and Protection Policy
- TMG-SEC-033: Financial Controls and Internal Audit Policy

14. POLICY REVIEW

This policy shall be:

- Reviewed annually by Legal, Compliance, and IT
- Updated to reflect legal and regulatory changes
- Approved by the Chief Legal Officer
- Communicated to all employees

15. DEFINITIONS

- **Record:** Any information created, received, or maintained as evidence of business activities.
- **Retention Period:** The length of time a record must be kept before disposal.
- **Litigation Hold:** Suspension of document destruction due to actual or anticipated litigation.
- **Disposal:** The destruction or deletion of records after retention period expires.
- **Vital Records:** Records essential for business continuity and legal compliance.

For questions about this policy, contact:

Legal Department

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