



SQFT Knowledge Services

DATA RETENTION POLICY

Document Revision History

Version	Document No	Date	Brief summary of changes	Prepared By	Approved By
1.0	SQFT/DR/POL/041	01-Mar-2021	Initial version created	K.Gokhul	S.Nandhini
1.0	SQFT/DR/POL/041	01-Mar-2022	Reviewed and no changes done	K.Gokhul	S.Nandhini
1.1	SQFT/DR/POL/041	03-Jan-2023	Reviewed and updated the policy for Privacy management systems	K.Gokhul	S.Nandhini
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1 PURPOSE

To establish procedures for identification, collection, indexing, filing, maintenance and disposition of records

2 SCOPE

All records used for performance of work, where absence of records affects the ISMS

3 POLICY

- a. The records shall be generated and collected on defined forms / formats during execution of various functional activities.
- b. The contents and period of maintenance procedure shall be mentioned on the cover sheets of these files / registers. The records that have exceeded the retention period will be disposed off by shredding them.
- c. The records in the file shall be indexed in the descending order of dates. In case a different method of indexing is required, the custodian shall mention the same on the cover of the file with the approval of Information Security and Privacy Officer.
- d. The records in hard copy form should be maintained in files or registers

4 DATA STORAGE

The rules on data storage vary according to the format of a data record, as set out below.

Electronic Records Storage - Documents, Email

All electronic documents, emails and multimedia records must be stored within the appropriate repository (shown below) to ensure that applicable security, backup, retention and disposal controls can be applied

5 TABLE OF RECORDS

1. Records pertaining to the ISMS

CONTENTS	CUSTODIAN	RETENTION PERIOD
ISMS Audits	COO	2 Years
ISMS Management Reviews (Minutes)	COO	2 Years
Group Asset Register, Group Risk Evaluation and Management Plan.	COO	2 Years
Group Asset Register, Group Risk Evaluation and Management Plan.	Functional Head	2 Years

Following records in soft copy should be maintained on central storage such as Dataserv2.

Server Event Log	IT Operations Manager	3 Months
IDS Logs	IT Operations Manager	3 months
Firewall Log	IT Operations Manager	3 Months
Server Monitoring Charts	IT Operations Manager	3 months

The following records are maintained on intranet PULSE.

CONTENTS	CUSTODIAN	RETENTION PERIOD
Additional Access Rights	COO	3 years
New Windows and email id	COO	3 years
Data Restoration Request	COO	3 years
Change Request	COO	3 years
FTP ID Creation	COO	3 years
VPN Access	COO	3 years
Firewall Access	COO	3 years
Reset Password	COO	3 years
Project Backup Request	COO	3 years
Internet Access	COO	3 years
Chat Request	COO	3 years
Operations - Projects	COO/ Users	10 Years
Specials	HR/IT/Users	5 Years
Confidential	HR/COO	5 Years
Restricted/ Partners	COO	5 Years

The following records are maintained under intranet PULSE under Employee's area under ISMS tab.

Security Incident / Weakness Report Register	COO	3 Years
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Records pertaining to Statutory and Regulatory Requirements

A) FINANCE:

Applicable Acts	Records / Forms	Time Limit
Accounting Standards	Audited Annual Reports	60 days from AGM
Central Sales Tax Act, 1956	a) Challans b) Return	Monthly, 25 th of next month (For JAN. – 20 th Feb.) Yearly, 30 th September

State Sales Tax Acts (Bombay Sales Tax)	<ul style="list-style-type: none"> • Challans • Return 	Monthly, 25 th of next month (For JAN. – 20 th Feb.) Yearly, 30 th September
Applicable Acts	Records / Forms	Time Limit
Employees Provident Fund & Miscellaneous Provisions Act, 1952	Challans	15 th of next month
Employees' State Insurance Act, 1948	Challans	Before 21 st of next month

Applicable Acts	Records / Forms	Time Limit
	TDS- a) Challans for salary deduction b) Challans for others (i.e. contractors, rent interest etc.) c) TDS returns Company Income Tax Returns along with tax audit report	Within 7 days from deduction First week on next month 30 th June 31 st October
Professional Tax	Challans Annual Return	20 th of next month 30 th JUNE

2. Administration:

Applicable Acts	Records / Forms	Time Limit
Apprentices' Act, 1961	Schedule III	Annually, by July 31 st
Tamilnadu Shops & Establishment Act, 1948	FORM 'B', FORM 'E'	Annually, by August 15 th
Maternity Benefits Act, 1961	Maternity Benefit Form 1a,b and Form 2	Maintained and made available for inspection, as needed.
Payment of Bonus Act, 1965	No records required	
Payment of Wages Act, 1965	No records required	
Payment of Gratuity Act, 1972	No records required	

3. Legal:

Sr . No	Legal / Regulatory / Stake Holder forced requirement	Compliance Details	Internal Verification Method	Period of Compliance	Remarks (if any)
1	Compliance to The Income Tax Act	Activities : Deduction and Deposits of TDS, Submitting Quarterly Return, Issuing Form 16A, Issuing Form 16, Payment of Self-Assessment Tax, Tax Audit, Transfer Pricing Report for transaction between Associated Enterprise, Submitting IT return annually, Payment of Advance Tax	Checklist and Periodic Reviews	Ongoing	NA
2	Compliance to GST	Payment of Service Tax, Half yearly Return	Checklist and Periodic Reviews	Ongoing	NA
3	Compliance to Professional Tax	Depositing professional tax, Professional Tax Return	Checklist and Periodic Reviews	Ongoing	NA

4	Compliance to Import - Export Authorities	Renewal of License	Reminder	Before expiry of license	NA
5	Compliance to IT Act (The Information Technology ACT, 2008)	Legal Requirement	Periodic Reviews on <i>cis-india.org</i>	Ongoing	NA
6	The Trade Marks Act, 1999	Compliances related to registration and better protection of trade marks for goods and services and for the prevention of the use of fraudulent marks.	checklist and periodic reviews	Before expiry of the Trademark term. Once registered, the trademarks are generally valid for a term of 10 years.	NA
7	The Copyrights Act, 1957 and SQFT Internal Copyright Policy.	To lay down a transparent process for registration and effective management of the IPR wealth of the company. Putting in place the effective management system for the ownership, control and management of the intellectual properties. Ensuring Compliance with certain internal procedures and all the applicable laws and regulations.	checklist and periodic reviews	Before expiry of the Copyright term. Once registered, the Copyrighted Work is generally valid for a term of 60 years from the date the Work is first published.	NA
8.	Contract Management Policy	Compliances related to drafting, reviewing, executing and managing various types of contracts executed and/or to be executed by the company and to ensure compliance of the procedure. To effectively manage a physical repository of all contracts. To effectively manage an electronic repository of all contracts through a centralized system with defined access to control list.	Periodic Reviews	Ongoing	NA

9	Trading) Regulations, 2015.]	promoter, person who is a part of the Promoter group, Director, Designated Employee may use his/her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.			
10	Whistleblower Policy / Vigil Mechanism	This policy commits the employees and other third party intermediaries to adhere to the highest standards of loyalty, honesty, integrity, transparency and conduct of business operations in an ethical manner. In compliance with Companies Act, 2013, rules framed thereunder and Listing Agreement entered with Stock Exchanges and principles of good corporate governance, the Audit Committee of the Company is committed to adopting procedures to receive and address any concern or complaint regarding accounting or auditing matters, internal accounting controls, reporting of fraudulent financial information or any other company matters involving fraud, employee misconduct, illegality or health and safety and environmental issues which cannot be resolved through normal management channels.	Periodic Reviews	Ongoing	NA

		potential or actual conflict of interest and may raise question about whether such transaction are consistent with the Company's and its stockholders' best interest. Hence the Company has adopted this Policy for dealing with such transactions.			
12.	Determining Material Subsidiaries	The Policy is framed by the Board of Directors of the Company to determine material subsidiaries of the Company and to provide governance framework for such subsidiaries of the Company.	Periodic Reviews	Ongoing	NA

4. Records pertaining to Human Resources (HR)

Applicable Acts	Records / Forms	Time Limit
Employees Provident Fund & Miscellaneous Provisions Act, 1952	Challans	15 th of next month
Employees' State Insurance Act, 1948	Challans	Before 21st of next month
Tamilnadu Shops & Establishment Act, 1947	FORM 'B', FORM 'E'	Annually, by August 15th
Maternity Benefits Act, 1961	Maternity Benefit Form 1a,b and Form 2	Maintained and made available for inspection, as needed.
Payment of Bonus Act, 1965	No records required	
Payment of Wages Act, 1965	No records required	
Payment of Gratuity Act, 1972	No records required	

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