



GC Maritime Consulting & Training, LLC

Data Retention Policy

1. Purpose

The purpose of this Data Retention Policy is to establish a clear framework for managing the retention, storage, and disposal of data within GC Maritime Consulting & Training, LLC (referred to herein as "Company"). This policy aims to ensure compliance with applicable laws, safeguard sensitive information, and maintain efficient data management practices.

2. Scope

This policy applies to all employees, contractors, and third parties who access, store, or manage data on behalf of the Company. It covers all forms of data, including digital and physical records.

3. Definitions

- **Data:** Any information recorded in any form, including paper documents, digital files, and emails.
- **Retention Period:** The length of time data is to be retained for business, legal, or regulatory purposes.
- **Disposal:** The process of securely destroying or anonymizing data that is no longer needed.

4. Retention Guidelines

Data Type	Retention Period	Reason for Retention	Disposition Method
Employee Records	5 years after employment ends	Legal, HR, Audit	Secure Shredding/Deletion
Financial Records	7 years	Tax, Legal, Regulatory Compliance	Archival or Secure Destruction
Customer Data	3 years after last interaction	Business Operations, Legal Compliance	Secure Deletion or Anonymization
Email Communication	1 year	Operational, Legal Compliance	Deletion or Archiving
Contracts and Agreements	6 years after expiration	Legal, Audit, Compliance	Secure Shredding/Archiving
Backup Data	90 days	Disaster Recovery, Operational Continuity	Secure Deletion
System Logs	1 year	Security, Compliance	Archiving/Deletion
Marketing Data	2 years	Business Operations, Legal Compliance	Secure Deletion or Anonymization



Data Type	Retention Period	Reason for Retention	Disposition Method
Research Data	5 years	Legal, Operational, Compliance	Secure Archiving or Deletion

Note: All retention periods may be subject to specific legal or regulatory requirements that require longer retention.

5. Roles and Responsibilities

- **Data Owners:** Responsible for ensuring that data is retained, managed, and disposed of in accordance with this policy.
- **IT Department:** Responsible for implementing technical controls to enforce retention and disposal processes for digital data.
- **Compliance and Legal Teams:** Responsible for reviewing retention periods to ensure compliance with applicable laws and regulations.
- **Employees:** Must adhere to this policy when handling, storing, or disposing of data.

6. Data Disposal and Destruction

When data reaches the end of its retention period, it must be securely disposed of to prevent unauthorized access. The following methods will be used for data disposal:

- **Digital Data:** Data will be permanently deleted using secure methods, such as data wiping or overwriting.
- **Physical Data:** Paper records will be shredded, and physical media (e.g., hard drives, USB drives) will be physically destroyed or wiped.

7. Data Review and Audits

Data retention practices will be reviewed annually to ensure compliance with this policy and relevant regulations. Audits may be conducted periodically to confirm that data is being retained and disposed of correctly.

8. Compliance with Legal and Regulatory Requirements

All data retention activities will comply with relevant local, state, and federal laws and industry-specific regulations (e.g., GDPR, HIPAA, CCPA, etc.). In the event of a legal hold, the affected data will be retained until the legal matter is resolved.

9. Exceptions

Any exceptions to this policy must be documented and approved by the Data Governance Committee or equivalent oversight body. Exceptions will only be granted in special cases where data must be retained longer due to legal, regulatory, or operational requirements.

10. Policy Review and Updates



This Data Retention Policy will be reviewed and updated annually or whenever there are significant changes in business operations or legal requirements.

Acknowledgement: By signing below, employees acknowledge that they have read and understood the Data Retention Policy.

Employee Name: Gabriella Cramer

Signature: 

Date: 6th Nov. 2024
