

CASTING FOR RECOVERY

RECORDS MANAGEMENT POLICY

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Effective Date: January 18, 2014

POLICY

This Records Management Policy (this “RM Policy”) is adopted by Casting for Recovery (“CfR”) to establish a uniform system for identifying, managing, retaining, securing, and, when appropriate, disposing of CfR’s Records (as defined below). This RM Policy is designed to maximize the overall organization and responsiveness of CfR and to avoid the expense of maintaining and storing outdated or superseded Records. CfR retains only those Records that are required to manage its business effectively and to satisfy its obligations to legal authorities and its members, employees, and participants. Retention obligations are outlined in the Record Retention Schedule (discussed below). Toward that end, absent an applicable Record Hold (as defined below), Records shall be disposed of as soon as they are no longer needed to satisfy business purposes or legal obligations, in accordance with the Record Retention Schedule.

SCOPE

This RM Policy applies to all subsidiaries, affiliates, business units, departments, and locations of CfR, and it applies to all of CfR’s members and employees and any independent contractors or other individuals tasked by CfR to manage records on its behalf (“Agents”). Records governed by this RM Policy include hard copy documents in CfR’s offices, in its employees’ or Agents’ offices, or at on-site or off-site storage locations, and such Records also include electronic records on systems owned or controlled by CfR or its members, employees, or Agents, regardless of whether these systems are located at CfR’s offices or locations.

OBJECTIVES

The primary objectives of this RM Policy are to:

- facilitate the management, retention, security, and proper disposition of Records;
- comply with statutory and regulatory requirements for Record retention;
- retain Records relevant to pending or reasonably anticipated legal actions, and enhance responsiveness and efficiency in complying with discovery demands;
- increase Records management efficiency and reduce costs by eliminating the retention of unnecessary, outdated, and superseded Records upon the satisfaction of their business purposes and applicable legal retention requirements; and
- enhance consistency in Record retention, storage, and disposal.

“RECORDS” DEFINED

“Records” include any hard copy documents or electronically stored information created, received, stored, or otherwise maintained by CfR or any of its members, employees, or Agents in connection with transacting CfR’s business or fulfilling its legal obligations. Information considered to be a Record may include, but is not necessarily limited to, documents having written text (*e.g.*, e-mail, correspondence, internal memoranda, Word documents, Excel spreadsheets, PowerPoint presentations), databases and other data (regardless of the software or application used to generate or store the data), graphical representations of data, photographs and other images, audio recordings (*e.g.*, voicemail), and video recordings. Records may be in the form of hard copy documents or may be stored on electronic media including, but not limited to, network drives, computer hard drives, tapes, DVDs, CD-ROMs, other disks, flash drives, other fixed, portable or removable storage media, or other electronic devices.

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<u>RECORD HOLDS</u>	<p><i>When litigation or a government investigation, examination, or enforcement proceeding (“Proceeding”) is pending or reasonably anticipated, potentially relevant Records must be preserved, even where such preservation results in retaining these Records beyond their otherwise applicable retention periods under the Record Retention Schedule. Under these circumstances, CfR shall initiate a “Record Hold” and shall work with its members, employees, and Agents to preserve Records potentially relevant to the subject of the Record Hold. Members, employees, and Agents notified of a Record Hold are responsible for preserving Records potentially relevant to the subject of the Record Hold until they receive written notice to end the Record Hold.</i></p>
<u>BUSINESS USE</u>	<p>Members, employees, and Agents are prohibited from using CfR’s information resources for illegal or unauthorized purposes. Any hard copy documents or electronically stored information that are:</p> <ul style="list-style-type: none"> • created, received, stored, or otherwise maintained by any of CfR’s members, employees, or Agents: <ul style="list-style-type: none"> ○ on CfR’s time; ○ at any of CfR’s offices or locations; or ○ using any of CfR’s information resources; <i>and</i> • that are unconnected to the transaction of CfR’s business, <p>(collectively “Non-Record Materials”) become the property of CfR and may need to be disclosed to parties outside CfR in the event of a Proceeding. <i>Members, employees, and Agents have no privacy rights in the Records and the Non-Record Materials they create and receive under the above-described circumstances.</i> In addition, Non-Record Materials may become subject to the same Record Hold requirements applicable to Records.</p>
<u>BACKUP MEDIA AND DISASTER RECOVERY</u>	<p>To assist in achieving the goals set forth in this RM Policy, CfR creates backups of its electronically stored information for disaster recovery purposes. <i>These backups are solely for disaster recovery purposes and may not be used as Record archives from which Records can be retrieved for other purposes.</i></p>
<u>RECORD RETENTION SCHEDULE AND SUPPLEMENTAL POLICIES</u>	<p>The Record Retention Schedule will establish how long certain types of Records must be maintained and when such Records must be disposed. Members, employees, and Agents seeking further guidance regarding CfR’s Records management practices are advised to refer to this Record Retention Schedule.</p>
<u>VIOLATIONS</u>	<p>Adherence to this RM Policy is vital to maintaining the security and integrity of CfR’s information assets. Compliance with this policy is mandatory. Depending on management’s evaluation of the circumstances, a violation of this RM Policy can result in corrective action ranging from counseling to termination of employment, as well as criminal and/or civil penalties where legal violations are involved.</p>
<u>FURTHER INFORMATION</u>	<p>For additional information regarding this RM Policy, please contact Whitney Milhoan, CfR’s Executive Director.</p>