

DOCUMENTATION DESTRUCTION GUIDELINES

At Caxton, we recognise the importance of following clear guidelines when it comes to the destruction of documents.

To achieve a best practice approach that will keep our business' information safe and secure, the following destruction guidelines must be followed:

1. Confirm the current document flow

Currently, each office is responsible for managing its own documents from the moment it is created or obtained, to the moment that it is destroyed. The same general rules apply to all offices and branches.

- If a document is in use, it must either be in the exclusive possession of the person(s) using it, or it must be filed and stored safely.
- Once a document contains personal information and is no longer in use, it must be destroyed. Shredding is one way of destroying a document.
- If a document contains personal information and it is no longer in use, but needs to be stored for accounting purposes, it may be filed and stored safely in a locked office for a maximum period of five years. During this period, no unauthorised person may access it. Once the five years have come to an end, the information is destroyed.

2. Shred before recycling

- Documents that contain personal information must not be left unattended. If it is not in use, it should be shredded. It may then be recycled. If need be, Caxton may consider appointing a professional service to conduct its shredding.

3. Conduct regular risk assessments

By regularly doing security risk assessments, we can identify areas of vulnerability and potential risks. This includes taking the time to document the flow of confidential information in each of our offices. Once the flow of information (where it is created, stored and accessed) has been reviewed, findings can be used to update the Destruction Guidelines if needed.

The importance of secure document shredding and destruction procedures should be clearly communicated and demonstrated to all employees. This will help them to understand the

importance of protecting the confidential information of the company its customers and third parties.

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