



Data Destruction and Retention Policy Of CMT FINANCIAL SERVICES(PTY)LTD

1. Introduction

CMT Financial Services(pty)ltd has developed this policy to highlight and ensure compliance with information and data security requirements. In addition, records management, through the proper control of the content, storage and volume of records, reduces the vulnerability to legal challenge and financial loss and promotes best value in terms of human and space resources through greater co-ordination of information and storage systems.

CMT Financial Services(pty)ltd is also required to align its procedures and processes with records, data and information protection laws. The policy applies to all who receive, create, have access to, manage, store and dispose records, including electronic records.

2. Policy Statement

It is the policy of **CMT Financial Services(pty)ltd** to manage its records in an accountable, effective and efficient manner through the implementation of a records management programme that takes into account related objectives such as orderly classification of records, retention and disposal, accessibility, security and confidentiality, training performance and quality management.

CMT Financial Services(pty)ltd is committed to protecting records and documents that contain sensitive information of the company, customers, employees, suppliers and contractors.

To this end –

- (a) All records received or created by **CMT Financial Services(pty)ltd** shall be managed, protected and disposed of in line with the regulatory framework applicable to this policy.
- (b) **CMT Financial Services(pty)ltd** shall follow sound procedures for the creation, maintenance, retention and disposal of all records, including electronic records.
- (c) The records management procedures of **CMT Financial Services(pty)ltd** comply with legal requirements.
- (d) **CMT Financial Services(pty)ltd** shall follow sound procedures for the security, privacy and confidentiality of its records.

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(e) **CMT Financial Services(pty)ltd** shall have performance measures for all records management functions and will review compliance with these measures.

3. Purpose of Policy

Records management policy outlines the principles, practices and procedures for the Management of **CMT Financial Services(pty)ltd** records.

The purpose of this policy is to:

- a. Regulate documents and records management practices within **CMT Financial Services(pty)ltd** and align them with relevant legislation
- b. Provide direction to employees on the registration, creation, approval, receipt, access, organisation, storage, use and disposal of documents, information and records
- c. Ensure that **CMT Financial Services(pty)ltd** is protected by complying with the records and information management legislation
- d. Ensure confidentiality, privacy, security, integrity, accessibility and retrievability of all employees' information and records among others, to ensure the safety of all important and sensitive documents and information. The policy further ensures ease of access to records and information. This will ensure efficient and effective execution of its functions. The policy further ensures continuity in the event of a disaster and protects the rights and interests of employees, clients, and other present and future stakeholders.

4. Policy Principles

This policy is developed based on the following principles that govern and support record management, record keeping and data retention practices:

- (a) Documents and records must be managed properly from creation to disposal.
- (b) **CMT Financial Services(pty)ltd** follows sound procedures and practices for the creation, receiving, maintenance, retention and disposal of all records and data, including electronic records.
- (c) **CMT Financial Services(pty)ltd** will follow sound procedures for the security, privacy and confidentiality of its data, records, as well as personal information at its disposal.
- (d) Identification, assessment and management of records, data and information security risks.
- (e) Monitoring of compliance with policy and reporting of areas of concern and / or non – compliance.
- (f) Implementing safe disposal methods for data and documents containing company, customer and supplier sensitive and personal information.
- (g) Valuable documents and records must be secured at all times.

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Documents and records must be accessible to authorised employees for business purposes.

- (h) **CMT Financial Services(pty)ltd** records and documents must be securely stored and preserved in a proper manner.
- (i) The purpose of this policy is to provide guidelines to all company employees on how to treat specific types of information, what confidentiality levels apply to what information classes, and especially what information may be shared with external parties.
- (j) **CMT Financial Services(pty)ltd** personnel are encouraged to use good judgment in securing **CMT Financial Services(pty)ltd** Confidential information to the proper extent - if an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their manager.

5. Storage and caring for records

- a. All **CMT Financial Services(pty)ltd** records shall be kept in storage areas or facilities that are appropriate for the type of medium as per the file plan.
- b. A record must only be kept in paper-based format in cases where it is deemed extremely necessary to keep it in its original form.

6. Access and security

- (a) Records shall at all times be protected from unauthorised access, movement and tempering with, to sustain their authenticity and reliability.
- (b) No employee may remove documents and records that are not available in the public domain from **CMT Financial Services(pty)ltd** offices or storage facilities without the explicit and written permission of Management.
- (c) No staff member shall provide information and records that are not in the public domain to the public without written approval of the Managing Director as per the PAIA.
- (d) Specific guidelines for requesting information are contained in the Promotion of Access to Information Manual that is maintained by the Information Officer.
- (e) Personal information shall be maintained in terms of the Protection of Personal Information.
- (f) No staff shall disclose any personal information of any member of staff, client or other stakeholder of **CMT Financial Services(pty)ltd** to any other person without prior written approval of the Management.
- (g) Security classified documents shall be protected against or from unauthorised disclosure.
- (h) Records storage area shall at all times be protected from or against unauthorised access. In this regard the following measures shall apply:
 - i. Records storage areas and records storage facilities shall be locked when not in use.
 - ii. Access to server rooms and storage areas for electronic records media shall be managed through appropriate access control.



7. Managing email records

- a. E-mails that are evidence of the business transactions of **CMT Financial Services(pty)ltd** are public records and shall be managed and kept for as long as they are required for functional and/or historical purposes.
- b. E-mails that approve an action, authorise an action, contain guidance, advice or direction, relate to projects and activities being undertaken, and external stakeholders, represent formal business communication between staff, contain policy decisions, etc. should be managed as records and should be filed securely. This policy covers the e-mail message itself as well as any attachments that meet these criteria.

8. Email of departing staff members

- a. Staff are required to perform a clean-up of all non-business related email messages in the email system prior to separating from **CMT Financial Services(pty)ltd** or transferring to another organisation.
- b. The records management function in collaboration with the Human Resources department, applies clearance procedures to all staff resigning from Sasria to ensure that records and emails are identified and filed so that they can be searched for, retrieved and retained for as long as needed.

9. Clean desk practices

The following principles govern and support **CMT Financial Services(pty)ltd** clean desk practices:

- (a) Filing / Safekeeping / locking up of confidential information and documents when unattended.
- (b) Approval of clean desk procedures and processes by the relevant Executive Manager, and implementation thereof by **CMT Financial Services(pty)ltd** Management and staff.
- (c) Availability of lockable storage and shredding facilities for use by all employees.
- (d) Identification, assessment and management of data and information security risks.
- (e) Monitoring of compliance with the Policy and reporting of areas of concern and / or non – compliance.
- (f) Minimising the printing of hard copy documents and encouraging the use of electronic documentation alternatives.
- (g) Reporting of incidents and information security near misses.
- (h) Training of staff to ensure awareness on the Policy and its attendant procedures and processes.
- (i) Implementing safe disposal methods for documents containing company, customer, staff and supplier sensitive and personal information.
- (j) Proper operation and security practices relating to information technology devices including computers, laptops, I-pads, cellular phones, memory sticks and other. This includes security of data



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