



## RECORD RETENTION AND DATA POLICY

### Purpose

Aussie Automotive Group (AAG) is committed to ensuring that complete and accurate records are created, managed, stored and disposed of in accordance with legislative and agreed organisational and ethical requirements. This policy is fundamental to ensuring all risks associated with records and data, including those contained in and transmitted via electronic communications devices used are mitigated.

### Principles

The intent of this policy is to:

- foster an organisational culture that recognises the strategic importance and the enduring value of records as critical assets of the organisation, providing evidence of its decisions, business activities and transactions and meet business, legislative and accountability requirements.
- encourage standardised recordkeeping practices that promote the sharing of knowledge and support evidence-based decision making to ensure that privacy and confidentiality will be maintained.
- commit to the provision of appropriate levels of security regarding confidential information ensuring that it will be securely stored, managed, and disposed of.

comply with the Privacy Act 1988 and comparative State/Territory based legislation, in addition to other policies, standards or guidelines made by the Office of the Australian Information Commissioner and respective Privacy/Information/ Data Security Commissioners in respective States/Territories about the making, keeping and disposing of affected private records.

### Legal Requirements

AAG is required by law to retain specific information and data for a predetermined amount of time.

The Record Retention Register is the approved document that identifies and manages AAG legal retention requirements.

### Access to Records

AAG restricts access to records by staff who are authorised by the appropriate information system delegate and access is regulated by position or business areas. Restrictions are used where AAG has a constructive obligation to maintain confidentiality or is required by law to do so.

Access to personal information is provided subject to the privacy principles in the Privacy Act 1988. Records must not be provided to external agencies or organisations without following the appropriate Privacy and commercial-in-confidence guidelines in consultation with the appropriate information system delegate.

### Suspension of Record Disposal In Event of Litigation or Claims

In the event AAG is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning AAG or the commencement of any litigation against or concerning AAG, such employee shall inform the General Manager and any further disposal of documents shall be suspended until such time as the General Manager, with the advice of counsel, determines otherwise. The General Manager shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

### Security of records

AAG ensures through the design and management of its recordkeeping systems that records maintain their integrity and authenticity through control mechanisms to prevent unauthorised access, alteration or removal.



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AAG utilises storage facilities appropriate to the format, usage, confidentiality, and continuing value of its records, so that they remain useable for as long as they are needed and any special requirements for security are met. Records held in electronic form are backed up on a regular basis and migrated to new systems when necessary, so that they remain useable for as long as they are needed.

### **Retention of information**

1. The Records Retention Register identifies the specific data retention methods. All data retention shall comply with this.
2. Retention of all emails are managed in accordance with this policy.

### **Disposal of records**

At the end of the storage period, the records can be disposed of appropriately (e.g. place in the rubbish, by shredding, or by using a secure document disposal sub-contractor). If there is no time identified, a period of 7 years will apply. Where records are destroyed, information about the records and the authority for their destruction is retained.

### **Violation of this Policy**

Any unauthorised, unlawful or unreasonable access or dissemination of physical or electronic records and communications as stated within this policy will result in disciplinary action, which may include termination of employment and / or appropriate legal action.

### **Notification and Escalation of Concerns**

It is important that any workplace or work-related concerns you have are raised so they can be addressed. In the first instance you should speak of write to your direct manager or manager's manager.

For matters of a serious or confidential nature you should email AAG at [confidential@aussieautogroup.com.au](mailto:confidential@aussieautogroup.com.au) and provide a means by which we can contact you. This email is monitored by a senior AAG executive who will contact you in absolute confidence. If emailing to this address it is important you stick to facts and events you have personal knowledge or information about including dates and times where known.

AAG will deal with all disclosures to this email in accordance with legislative requirements including referring any allegation to the relevant authorities for further investigation. While genuine mistakes or errors can occur, it is important to refrain from making frivolous, false, misleading, or unwarranted accusation towards another person as these can have severe implications for all parties involved, including the originator of any such allegation.

## **Aussie Automotive Group**

3 August 2021