

## **1. PURPOSE AND SCOPE**

TSI GROUP is hereinafter referred to as "the company" which includes TeDan Surgical Innovations Inc., West Coast Surgical Innovations LLC, Axxess Surgical Innovations LLC, and TeDan Surgical Innovations GmbH are covered by the scope of this policy.

The need to retain data varies widely with the type of data. Some data can be immediately deleted, and some must be retained until reasonable potential for future need no longer exists. Since this can be somewhat subjective, a retention policy is important to ensure that the company's guidelines on retention are consistently applied throughout the organisation.

The purpose of this policy is to specify the company's guidelines for retaining different types of data.

The scope of this policy covers all company data stored in physical form or on company-owned, company-leased, and otherwise company-provided systems and media, regardless of location.

Note that the need to retain certain information can be mandated by local law, industry regulations (ie. 21CFR820, Medical Device Regulation 2017/745 (MDR), ISO 13485, MDSAP Section 11; Reference TSI Records Control Procedure 402) and will comply with EU General Data Protection Regulation (GDPR) and the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003. Where this policy differs from applicable regulations, the policy specified in the regulations will apply.

## **2. RESPONSIBILITIES**

The IT Manager is responsible for the infrastructure and digital wellbeing of the data in question from a technology standpoint.

Each department is responsible for their own data management per the guidelines below.

## **3. POLICY**

The company does not operate a "save everything" approach and will only record the minimum data required. However, some data must be retained to service contracts, operate the business, protect the company's interests and generally conform to good business practices. Some reasons for data retention include in the table on the next page.

| Description                                                                                                                                                                                                                                                                   | Retention period                                                                          | Justification    | Medium             | Disposal method                                    |
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| <b>Company Records</b>                                                                                                                                                                                                                                                        |                                                                                           |                  |                    |                                                    |
| Company accounts, book-keeping and accounting records.                                                                                                                                                                                                                        | Minimum: 3 years<br>Maximum: life of company                                              | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| Company information:<br>Shareholder resolutions, Articles of Association,<br>shareholders' register, board resolutions, standing orders,<br>boards and shareholders' meetings minutes, supervisory<br>board's rules of procedure, supervisory council's rules of<br>procedure | Minimum: 10 years from the date of creation<br>or meeting<br>Maximum: life of the company | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| Directors' service contracts, employee contracts and<br>statement of terms (including ex pat contracts, work<br>permits/visas)                                                                                                                                                | Minimum: 6 years after termination of<br>contract                                         | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| DMR/MDF                                                                                                                                                                                                                                                                       | Per SOP 402                                                                               | Legal obligation | Electronic & Paper | Per SOP 402                                        |
| Other Device Related Records                                                                                                                                                                                                                                                  | Per SOP 402                                                                               | Legal obligation | Electronic & Paper | Per SOP 402                                        |
| Quality and Regulatory Systems                                                                                                                                                                                                                                                | Per SOP 402                                                                               | Legal Obligation | Electronic & Paper | Per SOP 402                                        |
| Records and documents of the dissolved legal entity                                                                                                                                                                                                                           | Minimum: 20 years from dissolution date                                                   | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| <b>Tax Records</b>                                                                                                                                                                                                                                                            |                                                                                           |                  |                    |                                                    |
| Corporation tax                                                                                                                                                                                                                                                               | Minimum: 6 years from relevant tax period.                                                | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| Payroll records (wages, tax (PAYE) and social security<br>(National Insurance) records, payslips, overtime<br>compensation, bonuses, expenses, benefits in kind) for the<br>purposes of tax returns                                                                           | Minimum: 6 years from relevant tax period.<br>Maximum: 10 years from relevant tax period. | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| VAT and customs records<br>(including tax and duty)                                                                                                                                                                                                                           | Minimum: 6 years from relevant tax period.<br>Maximum: 10 years from relevant tax period. | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| Stamp duty/property taxes                                                                                                                                                                                                                                                     | Minimum: 6 years from relevant tax period.<br>Maximum: 10 years from relevant tax period. | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |
| <b>Insurance</b>                                                                                                                                                                                                                                                              |                                                                                           |                  |                    |                                                    |
| Policy documentation                                                                                                                                                                                                                                                          | Minimum: 6 years<br>Maximum: 40 years (for employer's liability<br>certificates           | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding |

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| Reports relating to noise or workplace hazardous substances or other potential exposures                                                                                                                        | Minimum: 40 years                                                                                                                                                                     | Legal obligation    | Electronic & Paper | N/A                                                                              |
| <b>Intellectual Property &amp; Legal</b>                                                                                                                                                                        |                                                                                                                                                                                       |                     |                    |                                                                                  |
| Records including patent and trade mark registrations                                                                                                                                                           | Minimum: 6 years after the IP right ceases<br>Maximum: 40 years                                                                                                                       | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding                               |
| Contracts<br>(including non-disclosure agreements)                                                                                                                                                              | Minimum: 6 years after the contract ceases or<br>(if later) unless specified in contracts per SOP 402<br>6 years after the last obligation (eg a warranty) ceases under the contract. | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding                               |
| Deeds<br>(including property & lease agreements)                                                                                                                                                                | Minimum: 12 years after termination/transfer/release or sale with no future obligations or (if later) 12 years after the last obligation ceases under the agreement                   | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding                               |
| Terms and conditions of sale or purchase                                                                                                                                                                        | Minimum: 6 years after the contract ceases or (if later)<br>6 years after the last obligation ceases under the contract.                                                              | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding                               |
| CCTV/camera recordings                                                                                                                                                                                          | 30 days (or such period as is necessary to fulfil the purpose of such a recording)                                                                                                    | Legitimate interest | Electronic         | Automatic electronic deletion / Secure hardware disposal                         |
| <b>Employees</b>                                                                                                                                                                                                |                                                                                                                                                                                       |                     |                    |                                                                                  |
| Employment contracts and associated records (application forms, CVs references, written particulars of employment, changes to terms and conditions, training records, Emergency contacts / next of kin records) | Minimum: 6 years from termination of contract except for Job Applications, Training Records, and external certifications which fall under SOP 402.                                    | Legitimate interest | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Disciplinary records, Attendance records, Appraisal / performance review records                                                                                                                                | Minimum: 6 years from the end of the tax year to which the record relates                                                                                                             | Legitimate interest | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Pension records                                                                                                                                                                                                 | Minimum: 10 years<br>Maximum: Lifetime                                                                                                                                                | Legitimate interest | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |

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| Parental leave and Maternity records                 | Minimum: 3 years from the end of the tax year in which the parental leave / maternity pay period ends.<br>Maximum: 6 years from the end of the tax year in which the parental leave / maternity pay period ends.                                                                     | Legal obligation                                                | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Probation reviews and rejected job applicant records | Minimum: 6 months after notification of unsuccessful applicant                                                                                                                                                                                                                       | Legitimate interest                                             | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| National minimum wage records                        | Minimum: 3 years from the end of the tax year in which the pay reference period ends.<br>Maximum: 6 years from the end of the tax year in which the pay reference period ends.                                                                                                       | Legal obligation                                                | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Identification documents                             | Minimum: 2 years from termination of contract (foreign nationals)<br>Maximum: 6 years from termination of contract                                                                                                                                                                   | Legitimate interest<br>(Legal obligation for foreign nationals) | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| <b>Supplier Data</b>                                 |                                                                                                                                                                                                                                                                                      |                                                                 |                    |                                                                                  |
| Supplier contracts                                   | Minimum: Throughout the duration of the working relationship. Except for Approved Supplier List and files which are under SOP 402 for 15 years.<br>Maximum: 3 years after working relationship ceased unless ATEX, in which case 10 years.                                           | Contract                                                        | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Supplier contact details                             | Minimum: Throughout the duration of the working relationship.<br>Maximum: 1 year after working relationship ceased.                                                                                                                                                                  | Contract                                                        | Electronic & Paper | Electronic deletion /<br>Secure hardware disposal                                |
| <b>Customer Data</b>                                 |                                                                                                                                                                                                                                                                                      |                                                                 |                    |                                                                                  |
| Customer contracts                                   | Minimum: Throughout the duration of the contract / working relationship or per SOP 402 which indicates 10 years for Quotes, Distribution Agreements, Price lists, Sales Orders, Invoices, and Confirmations.<br>Maximum: 3 years after contract expires / working relationship ends. | Contract                                                        | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |

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| Customer contact details                                                      | Minimum: Throughout the duration of the working relationship.<br>Maximum: 1 year after contract expires / working relationship ends.                                                                   | Contract            | Electronic & Paper | Electronic deletion /<br>Secure hardware disposal                                                        |
| Customer consumption/device data                                              | Minimum: 5 years, unless agreed otherwise<br>Maximum: 15 years, unless agreed otherwise                                                                                                                | Contract            | Electronic & Paper | Electronic deletion /<br>Secure hardware disposal                                                        |
| Marketing lists                                                               | Minimum: Throughout the duration of the working relationship which as defined in the Opt-In disclosures expires within two years of re-engagement.<br>Maximum: 1 year after working relationship ends. | Legitimate interest | Electronic & Paper | Electronic deletion /<br>Secure hardware disposal                                                        |
| Customer supplied materials/information, outside of the above                 | Minimum: Throughout the duration of the working relationship unless we have signed approval for further use.<br>Maximum: 1 year after working relationship ceased.                                     | Contract            | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Return to customer /<br>Secure hardware disposal |
| <b>Health and Safety</b>                                                      |                                                                                                                                                                                                        |                     |                    |                                                                                                          |
| Accident records (including near misses, accident reports, traffic incidents) | Minimum: 3 years from the date of the last entry made in the record.                                                                                                                                   | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |
| Eye tests for users of display screen equipment                               | Minimum: 3 years after termination of employment.                                                                                                                                                      | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |
| Health surveillance related to asbestos                                       | Minimum: 40 years from the date of the last entry made in the record.                                                                                                                                  | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |
| Health surveillance related to substances that are hazardous to health        | Minimum: 40 years from the date of the last entry made in the record.                                                                                                                                  | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |
| Health surveillance related to ionising radiation                             | Minimum: 30 years from the date of the last entry made in the record or until subject reaches the age of 75.                                                                                           | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |
| Hearing tests for employees exposed to noise above an exposure limit value    | Minimum: 3 years after termination of employment.                                                                                                                                                      | Legal obligation    | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal                         |

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| Records of consultations with safety representative and committees                                                                                                                                                                      | Minimum: 6 years from the termination of the company.                                                                                                                   | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Records of tests and examinations of control systems and protective equipment related to substances that are hazardous to health                                                                                                        | Minimum: 5 years from the date on which the tests were carried out.                                                                                                     | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Other employee health records (e.g data necessary for emergency medical care, individual reintegration plans, individual treatment agreements, degree of incapacity for work, required workplace adaptations, eye tests, hearing tests) | Minimum: 3 years after termination of employment.                                                                                                                       | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| <b>Environmental</b>                                                                                                                                                                                                                    |                                                                                                                                                                         |                  |                    |                                                                                  |
| Environmental incidents/complaints                                                                                                                                                                                                      | Minimum: 10 years after remediation of the incident/resolution of the complaint.                                                                                        | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Pest Control and Maintenance records                                                                                                                                                                                                    | Minimum: Per SOP 402 – 15 years                                                                                                                                         | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Names and addresses of the clients/buyers of chemicals or environmentally dangerous substances (and preparations for these) which a company has manufactured, imported or supplied                                                      | Minimum: 10 years from the date the manufacturer, importer, downstream user and distributor last manufactured, imported, supplied or used the substance or preparation. | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Waste transfer notes for controlled waste                                                                                                                                                                                               | Minimum: 2 years from the date of transfer.<br>Maximum: 6 years from the date of transfer.                                                                              | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |
| Hazardous waste carrier consignment notes.                                                                                                                                                                                              | Minimum: 1 year from the date of delivery of the waste to its destination.                                                                                              | Legal obligation | Electronic & Paper | Electronic file deletion /<br>Paper file shredding /<br>Secure hardware disposal |

Note: Maximum retention period is the same as the minimum unless otherwise stated.

#### **4. DISPOSAL METHODS**

Automatic electronic deletion – an automatic service to prune data in accordance with the data retention periods.

Electronic file deletion – deletion of file from all electronic storage facilities. Removal from backups will take longer, due to backup retention policies.

Paper file shredding – cross paper shredding by a third-party, onsite and under supervision.

Return to customer – the option to return to the customer, instead of disposal.

Secure hardware disposal – where hardware (e.g. electronic storage device) disposal is required, this will be logged in a register, secured until disposal, and then securely destroyed onsite, under supervision.

#### **5. ENFORCEMENT**

This policy will be enforced by the IT Manager and/or Management Team. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company will report a data breach to the Information Commissioners Office and may also report such activities to the applicable authorities.

#### **REVISION HISTORY**

| Revision | Description               |
|----------|---------------------------|
| 01       | Initial document creation |