

Records Management Policy

Bryant Realty, Inc.

1. Purpose

This Records Management Policy establishes the framework for creating, storing, retaining, and disposing of company records to ensure legal compliance, operational efficiency, accountability, and non-repudiation.

2. Scope

This policy applies to all employees, contractors, and departments within Bryant Realty, Inc. Any document, file, or data created, processed, received, or stored as part of business operations qualifies as a company record unless specifically excluded.

3. Definition of Records

A record is any information captured or stored during business activities. Examples include:

- Customer transaction receipts
- Property sale/purchase documents
- Contracts and agreements
- Invoices, purchase receipts, quotes, and proposals
- HR documents, hiring records, background checks
- Employee timecards and payroll data
- Meeting notes, email correspondence, and project documentation

4. Records Storage Procedures

Bryant Realty will maintain a centralized file repository. Depending on business needs, this may be an on-premises file server or a cloud platform such as Microsoft 365 SharePoint/OneDrive.

Dedicated folders will exist for:

- Customer transactions
- Financial documents
- HR documentation
- Contracts and agreements
- Permanent records

Employees must move records to the appropriate repository immediately after creation or receipt.

5. Records Lifecycle Management

All records follow a defined lifecycle: creation, active use, retention, and disposition.

Retention schedules:

- Financial Statements: Permanent
- Other Financial Records: 7 years
- Payroll & Compensation: 3–7 years
- Hiring Records: 1 year
- Background Checks: 5 years
- Disciplinary Records: 7 years after termination
- Legal/Compliance Data: 7 years to permanent
- Customer Transactions: 3–7 years
- Vendor/Customer Contracts: 7 years

6. Disposition of Records

When the retention period expires, records may be deleted or archived.

Permanent records may be moved to offline storage if required.

Deletion must follow approved procedures to ensure data integrity and compliance.

7. Legal Hold

Legal holds override retention schedules. When a legal hold is declared:

- All relevant records must be preserved immediately.
- No record may be altered, deleted, or moved.

Legal holds remain in effect until explicitly lifted.

8. Use of Microsoft Purview (If Implemented)

Bryant Realty may use Microsoft Purview for automated records management, including:

- Retention labels and policies

- File plan import for lifecycle automation
- Auto■classification and record declaration
- eDiscovery for legal matters and investigations

9. Compliance & Auditing

Compliance will be monitored through:

- Microsoft 365 records activity logs, or
- Internal audits of local storage systems

Violations of this policy, including unauthorized alteration, deletion, or interference with records, may result in disciplinary action up to and including termination.

10. Policy Review

This policy will be reviewed annually or as needed to ensure compliance with laws and business requirements.