

PURPOSE:

Chatham Area Transit CAT's (CAT) records and data are valuable assets and should be well-organized, easy to retrieve, and destroyed in accordance with this policy and the retention schedule. Proper management of CAT's records and data ensures the quality, reliability, integrity, share ability, security, and transparency of the records and data.

CAT requires records be managed in an efficient and economical manner and in accordance with applicable compliance requirements. Through the implementation of this policy, CAT's intends to;

1. ensure compliance with Records Hold Orders,
2. improve access to CAT Records,
3. manage vital records that are essential for continuity of business in the event of a disaster and
4. safeguard the privacy and security of personal information.

DEFINITIONS:

1. **CAT Record:** Information recorded in any medium including, any hard-copy or electronic writing, e-mail, instant message, drawing, graph, chart, photograph, audio or video recording, image, or other data or data compilation that;
 - a. is created, received or maintained by any individual subject to this policy in that person's business capacity,
 - b. relates to the CAT or its business, and
 - c. is in the possession, custody or control of the CAT or an individual subject to this policy.
2. **Personally Identifiable Information (PII):** Any data that could potentially be used to identify a particular person. Examples include a full name, Social Security number, driver's license number, bank account number, passport number, and email address.
3. **Primary Records:** CAT Records maintained as official records of the business operations.
4. **Records Hold Order:** Written notification developed by the Compliance Department in connection with a pending or reasonably foreseeable legal proceeding, government investigation, court order, or audit that identifies categories of information or specific CAT Records that are subject to a records hold.

5. **Records Hold Release Order:** Written notification developed by the Compliance Department in connection with releasing certain CAT Records from a records hold.
6. **Records Disposition Order:** Form developed by the Compliance Department in connection with the destruction or transfer of certain CAT Records.
7. **Vital Records:** Records that are essential for the continuation or survival of the CAT in the event of a disaster. Vital records are necessary to recreate the CAT's Compliance and financial status and to determine the rights and obligations of employees, customers, stockholders, and other stakeholders.

SPECIFICS:

It is each employee's responsibility to ensure that records in the employee's possession, custody or control are managed in accordance with this policy. A critical part of CAT's compliance with record management is the State of Georgia Local Government Records Retention Schedule ("Retention Schedule"). The Retention Schedule specifies how long to retain a records series and when/how, the records can be destroyed. The current version of the Retention Schedule is attached to this policy and can be found at:

https://www.georgiaarchives.org/records/local_government/schedules/86.

This policy will be reviewed every year to ensure the most updated Retention Schedule is attached.

PROCEDURE:

A. Records Retention

CAT Records will be retained for the period of time described in the Retention Schedule. All CAT Records intended for storage must contain a CAT Record Storage Label on each end of the storage box that provides the following information:

1. Storage Control No.;
2. Department;
3. Date;
4. Type of Document (as identified in the Retention Schedule);
5. The departmental manager's name and signature; and
6. The division chief's name and signature.

Once completed, the CAT Record Storage Label must be presented to the Chief of Staff for review and approval. The Chief of Staff will provide the Storage Control No. on the storage label. Additionally, the Chief of Staff will maintain a searchable log of CAT Records in storage that contains the same information as above.

CAT Records may be disposed of in a manner commensurate with their sensitivity if they:

1. do not need to be retained pursuant to the records Retention Schedule,
2. are no longer needed for business purposes, and
3. are not subject to a Records Hold Order.

B. Record Hold Orders

The Chief of Staff or Compliance Department will issue Records Hold Orders. CAT Records subject to a Records Hold Order must not, under any circumstances, be altered, mutilated, concealed, deleted, disposed of or otherwise destroyed. The Chief of Staff or Compliance Department will issue Records Hold Release Orders notifying individuals when disposal procedures may be resumed.

C. Records Disposition

Disposition is authorized at the end of the records lifecycle. Records eligible for disposition are those that are no longer required to be maintained by applicable laws and approved record schedules. At the completion of their retention period, records must be designated for disposition absent a records hold. In many cases, the appropriate disposition is destruction.

Disposition occurs when the record is no longer active. There are three options for disposition:

1. records may be placed in inactive storage if they are still within their retention period, but the frequency of their use has diminished;
2. records may be destroyed when the retention period has lapsed; or
3. with prior arrangement or as mandated in the schedules.

All records eligible for disposition must have a Disposition Order. The Disposition order must be approved by the Chief of Staff.

Decisions regarding the method of disposal or storage location are made by the department assigned chief and in conjunction with the Chief of Staff and the Compliance department, taking into account any legal considerations.

Records can be placed in inactive storage if the retention period has not expired. Once the retention period has expired, the records should be destroyed.

Each Department will ensure proper disposition of records after the inactive/retention period phase is complete and records have fulfilled their prescribed retention period.

D. E-mail and Electronic Documents

E-mail and other electronic documents are CAT Records and will be managed in accordance with this policy and the Retention Schedule.

E. Ownership of Records

In accordance with applicable federal, state and local laws of the United States, CAT Records are the property of the CAT.

F. Responsibility

Each department will:

- Implement and communicate this Policy.
- Develop a records retention schedule for CAT Records.
- Periodically review CAT Records to determine whether they may be disposed of in accordance with this policy.
- Ensure that CAT Records in the possession, custody or control of employees who are separating from CAT and non-employees (including consultants, contractors and temporaries) who cease to perform services for the CAT are managed in accordance with this policy.

The Chief of Staff in conjunction with the Compliance Department will be responsible for developing and issuing Records Hold Orders and Records Hold Release Orders.

G. Personnel Records

Employees may view their own personnel file or obtain a copy during normal business hours after submitting a written request. Employees may request modifications of information contained in their records. Such requests should be submitted in writing to the property HR designee along with supporting documentation. The Company may make changes where appropriate, in its sole discretion. Employees may submit for inclusion memoranda stating their opinions regarding any documents contained in their records.

Unauthorized release of employee information will be cause for disciplinary action up to and including termination of employment.

H. Access by Former Employees

A request for review of personnel records of former employees is limited to those who have terminated service within the preceding 12 months prior to the date of the request, unless otherwise required by state law. Reasonable copying costs may be charged.

I. Access Pursuant to Legal Process

The Company will provide such records on employees as are covered by this policy to a municipal court, state or federal agency, arbitrator, union representative or other legal process in response to a proper request, subpoena or order. Where practical, the Company will notify the employee or former employee of the contents of the subpoena or order before supplying.

J. Employee Responsibility

Employees are responsible for notifying management of changes in address, telephone number and/or family status (births, marriage, death, divorce, legal separation, etc.) as income tax status and group insurance may be affected by these changes.

K. Records Containing Personally Identifiable Information

Collection of PII

PII will be collected from applicants and employees as required in order to meet federal and/or state reporting requirements. These purposes include:

- To conduct pre-employment background checks.
- To verify eligibility for employment.
- To withhold federal and state taxes.
- To comply with state new-hire reporting.
- To facilitate enrollment in Company benefits plans.

Note: PII may also be collected from creditors, suppliers or independent contractors. PII obtained by CAT will be subject to the same provisions of privacy as those for applicants and employees.

Use of Social Security Numbers

Except for verification and reporting uses for the above-referenced reasons, no Social Security number or portion of a Social Security number will be used in the conduct of the Company's business; and,

- No Social Security number or portion of a Social Security number will be permitted to be used for the following purposes: identification badges, parking

permits, time cards, posted employee rosters, computer passwords, licenses, agreements or contracts.

- No Social Security number should be used in open computer transmissions except where such transmission of information is by secure connection.

Storage of and Access to PII

All documents containing PII shall be stored in secured filing cabinets. All computer applications containing PII numbers shall be maintained on secured, authorized-access computer stations only.

Only persons who have a legitimate business reason will have access to PII; such access will be granted through department heads responsible for functions with reporting or transporting of such data responsibilities. Department heads and employees granted such access must take all necessary precautions to ensure the integrity of records that include such information when the records are not being used.

Destruction of PII

Records that include PII will be maintained in accordance with this policy. When such documents are released for destruction, the records will be destroyed by shredding.

REFERENCES:

Georgia Archives- State Government Records Retention Schedule

APPLIES TO:

All CAT employees and Departments

ATTACHMENTS:

- A. CAT Records Storage Label
- B. State Government Records Retention Schedule
- C. Record Disposition order