



Address: Plot No.11C, Industrial Park, Site – A, Ammavaripalli Village, Penukonda Mandal, Anantapur, Andhra Pradesh, India-515164

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CIN -U28999AP2017FTC107297, Tel: +91-9133442003

## Data Retention Policy

**Policy No.:** IS/DRP/01

**Effective Date:** 12-08-2024

**Review Cycle:** Annually

**Approved By:** P.Govindarajulu

### 1. Purpose

This policy defines the retention periods for business-related data and records at KSH Automotive Pvt. Ltd. and ensures compliance with legal, regulatory, and operational requirements. It supports responsible data management and aligns with applicable privacy, tax, and labor regulations.

### 2. Scope

This policy applies to all employees, departments, systems, and third-party service providers that handle physical or digital records on behalf of KSH Automotive Pvt. Ltd.

### 3. Policy Statement

KSH Automotive Pvt. Ltd. shall retain and dispose of data in a systematic, secure, and compliant manner based on defined retention periods outlined below. All records shall be protected against unauthorized access, alteration, or destruction.

### 4. Data Retention Schedule

Record Type	Retention Period	Disposition Method
Financial Records (Invoices, Ledgers)	10 years	Secure digital deletion/shredding



Record Type	Retention Period	Disposition Method
Employee Records (Active)	Duration of employment	Archived in HRIS
Employee Records (Former Staff)	7 years after separation	Secure deletion
Payroll Records	7 years	Digital purge
Procurement & Vendor Records	7 years	Manual/electronic deletion
Contracts & Legal Agreements	6 years after expiry	Secure shredding/deletion
Health & Safety Reports	30 years (where applicable)	Secure storage and archive
Email Records	5 years	Auto-deletion policy
CCTV Footage	60 days (unless flagged)	Auto-overwrite
Customer Data (CRM)	7 years after last interaction	Anonymization/Deletion
ESG & Sustainability Reports	10 years	Digital archiving
Conflict Minerals & HR Due Diligence Docs	7 years	Secure storage and review

## 5. Roles and Responsibilities

- **IT Department:** Ensure technical enforcement of retention timelines through systems.
- **HR Department:** Manage retention and disposal of personnel records.
- **Legal/Compliance:** Advise on legal retention obligations and hold data if under investigation.
- **All Employees:** Follow proper storage, access, and disposal protocols.

## 6. Data Disposal

Upon expiry of the retention period, data shall be disposed of securely:

- Digital data: Permanently deleted using certified tools
- Physical records: Shredded or incinerated through authorized vendors



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## 7. Exceptions

Records involved in litigation, audits, or investigations must be retained beyond their usual period until clearance from legal/compliance is obtained.

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## 8. Review and Audit

This policy will be reviewed annually or upon changes in regulatory requirements. Internal audits will assess adherence to this policy.

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## 9. Non-Compliance

Violations of this policy may result in disciplinary action, including termination and/or legal action as per company policies.

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### Prepared by

A handwritten signature in black ink that reads 'P. Gowind'.

Compliance Officer

**Approved on:** 12-08-2024

**Next Review Date:** 12-08-2025