

Email Retention Policy

1. Policy

- 1.1** The purpose of the Email Retention Policy is to guide employees in determining what information sent or received by electronic mail (email) should be retained and for how long. COMPANY employees shall retain all emails and attachments that are considered Business Records in accordance with the COMPANY Email Retention Schedule (see Attachment A).

2. Definitions

- 2.1 Business Records.** An email **or** an attachment is considered a Business Record if it is made within the regular course of business and records information related to COMPANY's business operations. Examples might include an email that contains information about patient treatment or an employee matter. Other examples might include an attached document containing financial data or legal correspondence.
- 2.2 Email Retention Schedule.** The Email Retention Schedule shows the folder names and retention periods for most of the Business Records that are either sent or received via email. The retention period determines how long an email and/or attachment will be kept.
- 2.3. Transitory Records, Working Documents, and Drafts.** Some email messages are NOT considered Business Records and are transitory in nature. Examples of Transitory Records include out of office replies, meeting notices, general announcements, etc. Similarly, Working Documents are messages and attachments that you may refer to frequently in transacting daily business but are not considered Business Records. Draft emails and attachments to draft emails are not considered Business Records.

3. Procedures

- 3.1** The information covered in this policy applies to all Company Business Records that are either sent or received via email.
- 3.2** COMPANY employees should classify emails and attachments by moving them (drag & drop) to the appropriate retention folder. Because not every type of Business Record type can be explicitly listed in the Email Retention Schedule or because multiple record types may apply to the same email or attachment, employees should contact their Department Supervisor for assistance. If further clarification is required, an employee may contact the Records Management or Legal Department.

- 3.3** Department Directors should contact the Records Management or Legal Department to propose addition or edits to the Email Retention Schedule as needed by their department.
- 3.4** Transitory Records and Working Documents have limited or short-term value and should be deleted when they are no longer needed. Draft versions of email do not need to be retained after they are superseded by later versions, unless there is an on-going COMPANY reason for maintaining a record of the development of the email. Otherwise they shall be deleted by the user when no longer needed as part of normal housekeeping and maintenance practices.
- 3.5** Email and attachments contained in an employee's Inbox will be retained for two years. The Inbox should primarily be used for working documents and convenience copies. Email and attachments contained in Drafts, Deleted Items, or Sent Items will be retained for 90 days.

4. Litigation Hold

- 4.1** In the event of a pending, threatened or reasonably foreseeable lawsuit or governmental investigation, COMPANY must preserve – and prevent deletion of – all relevant email and attachments. If COMPANY is involved in any pending or threatened litigation, or governmental investigations or inquiries, the Legal Department will issue a Litigation Hold Request to Information Services regarding any types of email and/or attachments that should be retained until the matter is resolved.
- 4.2** If an employee becomes aware of a reasonable probability that COMPANY will be involved in a lawsuit or government investigation, he or she must immediately advise their Department Director. The Department Director should then report the matter to Records Management or Legal Department.

5. Document Revision History

Rev #	Issue Date	Author	Changes

Appendix A. Email Retention Schedule

The Email Retention Schedule provides a detailed list of record types and retention periods and is considered an integral part of this Policy.

The current file name is:

The latest revision date is:

This document can be found at: