

Data Retention and Destruction

Issue Date: 4/28/2020

Revised: 3/17/2021

I. DEFINITIONS

Term	Definition
CMS	Centers for Medicare and Medicaid Services
Carrier	Insurance Company, or Plan Sponsor as defined by CMS
HIPAA	Health Insurance Portability and Accountability Act

II. PURPOSE

The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure records that are no longer needed or are of no value are disposed of properly. This Policy is also for the purpose of aiding Integrity Marketing Group personnel in understanding their obligations in retaining corporate records. A corporate record is any type of information created, received, or transmitted in the transaction of Integrity Marketing Group business, regardless of physical format but excludes any information that is more transitory in nature or do not represent significant steps or decisions in the preparation of a corporate record. Questions on determining what is defined as a record should be directed to the Partner's Compliance Officer.

III. POLICY

Integrity Marketing Group will ensure proper maintenance and disposal of all records, both hard-copy and electronic, in accordance with industry and Company regulations

IV. PROCEDURE

Retention

Records will be stored and maintained in accordance with Integrity Marketing Group Data Protection Policy, CMS Record Retention Policy, and HIPAA Handling Confidential Information Policy.

Destruction

Integrity Marketing Group will follow the Data Protection Policy for the appropriate disposal of all records that no longer serve a business purpose in accordance with the Record Retention Schedule below (see Appendix A).

V. LITIGATION HOLDS AND OTHER SPECIAL SITUATIONS

Integrity Marketing Group requires all personnel to comply fully with its published records retention schedule and procedures as provided in this policy. All employees should note the following general exception to any stated destruction schedule: If the Legal Department

determines that Integrity Marketing Group records are relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, those records are to be preserved and not deleted, disposed, destroyed, or changed until the Legal Department determines those records are no longer needed. This exception is referred to as a litigation hold or legal hold, replaces any previously or subsequently established destruction schedule for those records.

In addition, Integrity Marketing Group may suspend any routine document disposal procedures in connection with certain other types of events, such as the merger of Integrity Marketing Group with another organization or the replacement of Integrity Marketing Group information technology systems.

VI. DISCIPLINARY ACTION / SANCTIONS

Those who violate this policy are subject to discipline in accordance with our Sanctions and Disciplinary Action Policy

Appendix A: Record Retention Schedule

A. ACCOUNTING AND FINANCE	
Accounts Payable & Receivable Records	7 Years
Financial Statements & Budgets	7 Years
Bank Statements & Cancelled Checks	7 Years
Employee Expense Reports	7 Years
Credit Card Records, showing credit card number All customer/agent records with credit card numbers must be stored in a PCI compliant manner. <i>Credit card numbers must not be stored on company devices or networks.</i>	2 years
Investment Records	7 Years
General Ledger	Permanent
Annual Audit Reports, Financial Statements & workpapers related to the audit	Permanent
Commission Statements, paper and electronic records	Maximum of 7 years, minimum to follow carrier rules for disputing payments
Financial records related to Partner prior to acquisition,	Please consult your prior tax advisor.
B. CONTRACTS	
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination
Carrier contracts related to MA/PDP products must meet CMS retention standards	Minimum of at least 10 years from inception date or 7 years after termination/expiration
C. CORPORATE RECORDS	
Corporate Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of incorporation, bylaws, annual corporate reports):	Permanent
Licenses and Permits	Permanent

D. CORPORATE INSURANCE	
Insurance Certificates Issued	Permanent
Group Insurance Plans - Active Employees	Until Plan is amended or terminated
Group Insurance Plans - Retired Employees	Permanent or until 6 years after death of last eligible participant
Insurance Policies	Life of the policy or until there is no longer a business need
E. HUMAN RESOURCES	
Employee Deduction Authorizations	4 years after termination
Payroll Deductions	Termination + 7 years
W-2 and W-4 Forms	Termination + 7 years
Garnishments and Assignments	Termination + 7 years
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net):	7 years
Time cards/sheets	2 years
Unclaimed Wage Records	6 years
Retirement and Pension Records	Permanent
F. HUMAN RESOURCES - PAYROLL DOCUMENTS	
Commissions/Bonuses/Incentives/Awards	7 years
EEO-1 / EEO-2 - Employers Information Reports:	2 years after superseded or filing (whichever is longer)
Employee Earnings Records:	Separation + 7 years
Employee Handbooks:	1 copy kept permanently
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records	6 years after separation
Employment Contracts - Individual:	7 years after separation

Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings:	3 years from date of hiring decision
Employment Records - All Non-Hired Applicants	2-4 years (4 years if file contains any correspondence which might be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records:	3 years
Forms I-9	3 years after hiring, or 1 year after separation if later
G. LEGAL FILES AND PAPERS	
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years
Intellectual Property Filings including Trademark registrations, evidence of use documents, patents, patent applications, supporting documents and copyright registrations)	Permanent
H. POLICYHOLDER APPLICATIONS	
Medicare Advantage and Prescription Drug Plans: All documentation related to the sale including customer application, and scope of appointments. See policy for CMS Record Retention Requirements.	Minimum of 10 years in accordance with CMS regulations or life of the policy, whichever is longer
Documentation related to the sale of insurance policies including customer applications, illustrations, quotes, etc.	Minimum of 7 years or the life of the policy after there is no longer a business need, whichever is longer

I. TAX RECORDS	
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings:	Permanent
All Tax Records including Payroll, Excise, Sales & Use Tax	7 years
Tax Bills, Receipts, Statements:	7 years
Tax Returns	Permanent
Tax Workpaper Packages	7 years
Annual Information Returns - Federal and State	Permanent
IRS or other Government Audit Records	Permanent
J. MEDICARE ADVANTAGE/PRESCRIPTION DRUG PLAN DOCUMENTS	
Documents related to the services provided to a MA or Part D Plan Sponsor: OIG/SAM exclusion list search results, annual training documents, Code of Conduct, and related attestations, policies and procedures, downstream oversight, etc. See policy for CMS Record Retention Requirements.	10 years