

RECORD RETENTION POLICY

International Beauty Professionals Association, Inc.

Effective Date:

03.12.2026

Adopted By:

Board of Directors of International Beauty Professionals Association, Inc.

1. Purpose and Authority

This Record Retention Policy (the “Policy”) establishes the formal requirements, retention standards, preservation obligations, storage rules, access controls, and destruction procedures applicable to the books, records, documents, files, communications, and data of **International Beauty Professionals Association, Inc.** (the “Association” or “IBPA”).

This Policy is adopted to:

- (a) promote lawful, consistent, and responsible recordkeeping practices;
- (b) support accurate governance, financial administration, and operational continuity;
- (c) ensure that records are retained for periods reasonably necessary to satisfy legal, regulatory, governance, audit, tax, operational, and evidentiary needs;
- (d) protect confidential, sensitive, financial, legal, and membership-related information from unauthorized disclosure, loss, misuse, destruction, or alteration;
- (e) ensure that records are destroyed in an orderly, secure, and legally appropriate manner when retention is no longer required; and
- (f) reduce legal, operational, reputational, and compliance risks associated with improper record retention or destruction.

This Policy shall be interpreted in conjunction with the Bylaws, Governance Policy, Privacy Policy, Membership Policy, Conflict of Interest Policy, Committee Charters, and other governing documents of the Association. In the event of a conflict, the Bylaws shall prevail unless otherwise required by law.

2. Scope of Application

This Policy applies to all records created, received, maintained, stored, transmitted, archived, or controlled by the Association, regardless of:

- (a) physical or electronic format;
- (b) storage medium;
- (c) location of storage;

- (d) whether the record was created internally or received from an external source; or
- (e) whether the record is maintained directly by the Association or by an authorized third-party service provider.

This Policy applies to all persons acting for or on behalf of the Association, including but not limited to:

- (a) Directors;
- (b) Officers;
- (c) committee members;
- (d) employees;
- (e) contractors and consultants;
- (f) volunteers;
- (g) reviewers, judges, and evaluators;
- (h) authorized agents and representatives; and
- (i) any other person or entity with access to Association records.

All such persons are expected to preserve, manage, and handle records in accordance with this Policy and any related procedures adopted by the Association.

3. Definitions

For purposes of this Policy, the following definitions shall apply:

3.1 Record

“Record” means any document, file, correspondence, communication, data set, form, database entry, image, report, spreadsheet, financial statement, application, agreement, memorandum, note, draft, or other recorded information created, received, or maintained in connection with Association activities, regardless of physical or electronic form.

3.2 Official Record

“Official Record” means a record that evidences or supports governance, legal, financial, membership, contractual, policy, tax, compliance, or operational matters of the Association and that must be retained in accordance with this Policy or applicable law.

3.3 Electronic Record

“Electronic Record” means any record in digital form, including email, cloud-based data, shared drive documents, databases, scanned records, messaging-based files preserved for business use, and other electronically stored information.

3.4 Retention Period

“Retention Period” means the minimum period of time a record must be preserved before it may be considered for destruction, unless a longer period is required by law, audit, investigation, litigation hold, contract, governance decision, or operational necessity.

3.5 Destruction

“Destruction” means the permanent disposal, deletion, shredding, erasure, or other irreversible elimination of a record so that the information cannot reasonably be reconstructed or retrieved.

3.6 Legal Hold

“Legal Hold” means a requirement to preserve records that may be relevant to litigation, threatened litigation, investigation, audit, subpoena, regulatory inquiry, dispute, enforcement action, or similar matter, regardless of whether the ordinary retention period has expired.

4. General Recordkeeping Principles

The Association shall maintain records in a manner that is:

- (a) accurate;
- (b) complete to the extent reasonably necessary;
- (c) organized and retrievable;
- (d) secure and protected from unauthorized access, misuse, alteration, or destruction;
- (e) consistent with applicable law and good governance practices; and
- (f) appropriate to the nature, sensitivity, and importance of the records involved.

Records shall be retained only as long as reasonably necessary for legal, tax, regulatory, governance, contractual, operational, evidentiary, or historical purposes. Records shall not be destroyed if they are subject to a Legal Hold or other preservation requirement.

The Association shall make reasonable efforts to avoid both:

- (a) premature destruction of records that should be preserved; and
 - (b) indefinite retention of records that no longer need to be maintained.
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5. Categories of Records

Without limitation, records covered by this Policy include the following categories:

5.1 Corporate and Governance Records

Including but not limited to:

- (a) Articles of Incorporation;
- (b) Bylaws and amendments;
- (c) Board resolutions;
- (d) Board and committee meeting minutes;
- (e) governance policies;
- (f) committee charters;
- (g) annual governance reports;
- (h) internal governance memoranda.

5.2 Membership and Applicant Records

Including but not limited to:

- (a) membership applications;
- (b) supporting documentation submitted by applicants;
- (c) applicant evaluations;
- (d) membership status records;
- (e) renewals;
- (f) disciplinary or review records;
- (g) directory listing records;
- (h) appeals-related records.

5.3 Financial and Tax Records

Including but not limited to:

- (a) budgets;
- (b) bank statements;
- (c) ledgers and accounting reports;
- (d) invoices and receipts;
- (e) payment records;
- (f) reimbursement documentation;
- (g) tax filings and related work papers;
- (h) audit materials;
- (i) compensation approval records.

5.4 Contractual and Legal Records

Including but not limited to:

- (a) executed contracts;
- (b) amendments;
- (c) sponsorship agreements;
- (d) vendor agreements;
- (e) service agreements;
- (f) legal correspondence;
- (g) demand letters;
- (h) dispute records;
- (i) settlement-related records, if any.

5.5 Program, Event, and Recognition Records

Including but not limited to:

- (a) event planning files;
- (b) registration data;
- (c) speaker agreements;
- (d) competition records;
- (e) judging materials;
- (f) awards nominations;

- (g) recognition decisions;
- (h) program evaluations.

5.6 Communications and Administrative Records

Including but not limited to:

- (a) official email communications;
- (b) administrative correspondence;
- (c) notices;
- (d) newsletters and public announcements;
- (e) policy drafts and revision histories where relevant;
- (f) internal operating documents.

5.7 Intellectual Property and Brand Records

Including but not limited to:

- (a) trademark-related materials;
- (b) logo and brand files;
- (c) publication rights records;
- (d) licenses granted or received;
- (e) website content ownership records.

5.8 Personnel and Contractor Records

If applicable, including but not limited to:

- (a) contractor agreements;
- (b) payment records;
- (c) role descriptions;
- (d) performance-related records;
- (e) confidentiality acknowledgments.

6. Retention Schedule

The Association shall retain records for at least the minimum periods set forth below, unless a longer period is required by law, contract, audit requirement, Legal Hold, or Board directive.

6.1 Permanent Retention

The following records shall be retained permanently:

- (a) Articles of Incorporation;
- (b) Bylaws and all amendments;
- (c) Board and committee minutes of material governance significance;
- (d) Board resolutions and major governance decisions;
- (e) major policy documents and amendments;
- (f) tax exemption determinations or recognition letters, if applicable;

- (g) records relating to intellectual property ownership;
- (h) permanent historical records designated by the Board.

6.2 Financial and Tax Records — Minimum Seven (7) Years

Unless a longer period is required, the following shall be retained for at least seven (7) years:

- (a) annual financial statements;
- (b) general ledgers;
- (c) invoices and receipts;
- (d) bank statements and reconciliations;
- (e) expense reimbursement records;
- (f) tax returns and related supporting materials;
- (g) financial reports and work papers;
- (h) payment processing records, to the extent maintained by the Association.

6.3 Membership and Applicant Records

Unless otherwise required:

- (a) denied or incomplete membership applications — at least three (3) years after final action;
- (b) approved membership applications and core membership records — for the duration of membership plus at least three (3) years;
- (c) membership review materials of significance — at least five (5) years;
- (d) disciplinary, suspension, termination, or appeal records — at least five (5) to seven (7) years after final resolution, depending on significance and legal risk.

6.4 Contracts and Legal Records

Unless otherwise required:

- (a) executed contracts and amendments — for the duration of the contract plus at least seven (7) years;
- (b) expired agreements of ongoing significance — seven (7) years or longer as appropriate;
- (c) legal correspondence and dispute-related records — at least seven (7) years after final resolution.

6.5 Event, Awards, and Program Records

Unless otherwise required:

- (a) event records — at least three (3) years;
- (b) awards nominations and evaluations — at least three (3) to five (5) years depending on significance;
- (c) competition and judging records — at least three (3) years;
- (d) final award recipient records of institutional significance — at least five (5) years, and longer if designated archival.

6.6 Administrative and Communication Records

Routine administrative records may be retained for two (2) to three (3) years unless they fall into another category requiring longer retention.

6.7 Drafts and Non-Final Working Materials

Non-final drafts, duplicate copies, and routine working materials that do not serve legal, governance, or operational record functions may be discarded when no longer needed, provided they are not subject to a Legal Hold, policy requirement, or preservation obligation.

7. Storage, Organization, and Protection of Records

The Association shall maintain all records in a secure, organized, and controlled manner appropriate to the nature, sensitivity, and importance of such records.

Without limitation, the Association shall implement reasonable administrative, technical, and physical safeguards designed to:

- (a) prevent unauthorized access, disclosure, alteration, or destruction of records;
- (b) protect records against accidental loss, damage, or corruption;
- (c) ensure continuity of access and operational usability;
- (d) facilitate timely retrieval of records when required for governance, operational, legal, financial, or compliance purposes; and
- (e) maintain integrity, accuracy, and completeness of records.

7.1 Electronic Records

Electronic records shall be maintained using reasonably secure systems, which may include:

- (a) password-protected platforms;
- (b) role-based access controls;
- (c) secure cloud storage providers;
- (d) encrypted systems where appropriate;
- (e) backup and recovery systems;
- (f) logging, monitoring, or audit trails where appropriate.

The Association shall take reasonable steps to ensure that electronic records are regularly backed up and protected from system failure, cyber threats, or unauthorized access.

7.2 Physical Records

Physical records shall be maintained in secure locations, including but not limited to:

- (a) locked cabinets or storage units;
- (b) restricted access offices or facilities;
- (c) controlled access to sensitive documents;
- (d) protection against environmental risks where reasonably feasible.

7.3 Access Control

Access to records shall be limited to individuals who have a legitimate business, governance, or operational need.

Access may be restricted based on:

- (a) role;
- (b) level of authority;
- (c) confidentiality classification of the record;
- (d) legal or compliance requirements.

Unauthorized access, use, or distribution of records is strictly prohibited.

8. Confidentiality and Sensitive Information

The Association recognizes that certain records contain confidential, proprietary, personal, financial, legal, or sensitive information requiring enhanced protection.

Such records shall be handled in accordance with:

- (a) the Privacy Policy;
- (b) the Governance Policy;
- (c) the Conflict of Interest Policy;
- (d) applicable contractual obligations; and
- (e) applicable laws and regulations.

Confidential information shall:

- (a) not be disclosed to unauthorized persons;
- (b) not be retained or transmitted in insecure systems;
- (c) be accessed only on a need-to-know basis; and
- (d) be protected against misuse, unauthorized duplication, or unauthorized dissemination.

Where appropriate, the Association may classify records by sensitivity level and implement corresponding access restrictions.

9. Responsibility for Record Management

The Board of Directors retains ultimate responsibility for oversight of recordkeeping practices and compliance with this Policy.

The Board may designate specific roles for administration and implementation, including but not limited to:

- (a) the Secretary, who may oversee corporate records, governance documents, and official filings;
- (b) the Treasurer, who may oversee financial records and accounting documentation;
- (c) Committee Chairs, who may be responsible for maintaining and submitting committee-related records;
- (d) designated administrative personnel or service providers responsible for technical storage, archiving, and retrieval systems.

All individuals with access to Association records are responsible for complying with this Policy and applicable procedures.

Failure to comply may result in disciplinary, governance, or contractual consequences.

10. Destruction of Records

Records shall be destroyed only in accordance with this Policy and only when all of the following conditions are satisfied:

- (a) the applicable retention period has expired;
- (b) the record is not subject to a Legal Hold;
- (c) the record is not required for any pending or reasonably anticipated legal, audit, compliance, governance, financial, or operational matter; and
- (d) destruction is conducted in a secure and appropriate manner.

Destruction methods shall be appropriate to the nature of the record and may include:

- (a) shredding of physical documents;
- (b) secure disposal of paper records;
- (c) permanent deletion of digital records;
- (d) certified destruction by authorized third-party vendors.

The Association shall take reasonable steps to ensure that destroyed records cannot be reconstructed or recovered.

11. Suspension of Destruction; Legal Hold

If the Association becomes aware of, or reasonably anticipates:

- (a) litigation or threatened litigation;
- (b) audit or regulatory review;
- (c) investigation or inquiry;
- (d) subpoena or legal demand;
- (e) dispute or enforcement action; or
- (f) internal disciplinary or governance proceedings;

then the destruction of relevant records shall be immediately suspended.

Upon implementation of a Legal Hold:

- (a) affected individuals shall be notified;
- (b) all relevant records must be preserved in their current state;
- (c) routine destruction schedules shall be overridden;
- (d) no alteration or deletion of such records shall occur.

A Legal Hold shall remain in effect until formally lifted by the Association or its authorized legal or governance authority.

12. Prohibited Conduct

No person acting on behalf of the Association shall:

- (a) destroy records in violation of this Policy;
- (b) destroy or alter records subject to a Legal Hold;
- (c) intentionally falsify, alter, or manipulate records for improper purposes;
- (d) conceal or withhold records relevant to governance, legal, financial, or compliance matters;
- (e) remove or transfer records without authorization;
- (f) store official records in personal systems in a manner that interferes with Association control or access.

Any such conduct may result in disciplinary action, removal from position, termination of membership, contractual consequences, or legal action where applicable.

13. Periodic Review and Policy Administration

The Board of Directors, or its designated representatives, may periodically review:

- (a) record categories;
- (b) retention schedules;
- (c) storage systems;
- (d) compliance practices;
- (e) risks associated with record management.

The Association may adopt supplementary procedures or internal guidelines to support implementation of this Policy.

14. Relationship to Other Governing Documents

This Policy shall be read together with:

- Bylaws;
- Governance Policy;
- Privacy Policy;
- Membership Policy;
- Conflict of Interest Policy;
- Committee Charters;
- and other governing documents of the Association.

In the event of inconsistency, the Bylaws shall control unless otherwise required by law.

15. Amendments

This Policy may be amended, modified, or repealed by the Board of Directors at any duly authorized meeting or by lawful written action.

Any amendment shall become effective as specified in the approving resolution unless otherwise stated.

16. Official Language

The official version of this Policy shall be maintained in English.

Any translation is provided for convenience only.

In the event of any discrepancy, inconsistency, or conflict between translations, the English version shall prevail.