

Record Retention Policy (v1.4)

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Version	Date	Change
1.4	May 2025	Crypto-asset transfer records added to the schedule
1.3	November 2023	Reconstruction requirement made explicit

[Earlier versions omitted]

Contents

- Purpose
 - Retention schedule
 - Transaction records**
 - Customer due diligence records
 - Deletion and legal holds
- Appendix A: Record classes and periods

Sections in bold are excerpted below.

[Sections 1 and 2 omitted]

3. Transaction records

3.1 Records of transaction data, including payment messages and accompanying information, are retained for seven years from the date of the transaction.

3.2 On the expiry of the applicable retention period, records containing personal data are deleted in accordance with the Data Protection Policy, unless a legal hold applies.

3.3 Records are retained in a form that permits the reconstruction of individual transactions and is admissible in legal proceedings.

[Sections 4 onward omitted]