

DATA PRIVACY DOCUMENT #
INFORMATION GOVERNANCE RETENTION SCHEDULE

NOTICE

This document is for the sole use of Company and its designated representatives.

PUBLISHED BY

AFFECTED GROUPS/DEPARTMENTS:

APPROVING AUTHORITIES:

REVISION:

SUPERSEDES REVISION:

1. THE COMPANY RECORDS RETENTION SCHEDULE

The Company's ("the Company"), Information Governance ("IG") program, is structured in two components:

1. The Information Governance Policy which outlines, in general terms, the Company's course and methods of action in the declaration and management of its records and information;
2. This Information Governance Retention Schedule ("Retention Schedule"), which sets forth retention periods for the Company's records.

These documents were compiled by IG office and shall be implemented by business units to identify and describe the Company's records and guide the retention and disposition of both records and information throughout their lifecycles.

An extension of the retention period may be applied, based on the outcome of an annual review, when justified by changes to business conditions or legal requirements and the requestor has documented the requirements and received approval from the responsible resource.

2. PURPOSE

The purpose of this Retention Schedule is to set forth the specific periods of time that Company information must be retained to ensure corporate governance and administration of the Company's IG program. The retention periods are based on applicable legal and/or regulatory requirements and the Company's operating needs.

3. SCOPE

Applicability: This Retention Schedule applies to recorded information of the Company, regardless of its location, status or format. Entities and departments must contact the IG Office at if local government regulations state a variance in a retention period that this Schedule set forth.

Personnel: All employees, agents and external parties who create, transfer, store or have access to records and information of the Company must manage these assets with integrity and the appropriate level of confidentiality, and must comply with the Records Retention Schedule, Hold Order procedures, and all other Company standards and policies that address information creation, use, access, security, confidentiality, preservation, disposal and destruction.

Hold Orders: If a Legal Hold or Tax Hold order is issued, personnel are required to retain records and information for as long as the Hold remains in effect, even if that period is longer than the period defined in the Retention Schedule. Such information must be retained until you have been advised by the legal or tax department that the hold order has ceased.

Retention Exception Process: For an individual record or a group of records that are required to be retained longer than the prescribed period defined in the Retention Schedule, an exception approval must be obtained. The exception request should be submitted by the Record Owner, approval from the

Director of Information Governance, an authorized Legal representative and the Vice President or above of the Record Owners' Business Unit shall be secured.

Record Categories: This schedule defines the categories of information and the retention period for each category or sub category. Unless otherwise specified as an exception, all information described by the category should be retained for the corresponding retention period for the particular category. For information that does not fit into a category set forth in this Retention Schedule, contact the responsible resource for direction.

Format: The Retention Schedule applies to all forms of information and to all types of media that houses the information, including paper, microfilm/microfiche, other analog media, as well as digital media and electronically stored information.

Benefits of Compliance: Compliance with this Retention Schedule is mandatory. Enabling compliance with laws and regulations; preserving records and information that have business, legal, or other value; promoting cost-effective access and retrieval of records and information; define the requirements for proper and prompt disposal of unnecessary records and information; reducing the costs of storage, search, collection, processing, review, and production of unnecessary records and information; enabling compliance with preservation and retention requirements in regulatory, investigative, and legal proceedings; and preserving corporate institutional knowledge and history.

4. RECORDS RETENTION SCHEDULE: FUNCTIONAL CATEGORIES

4.1. ADMINISTRATIVE & INTERNAL BUSINESS INFORMATION

The term "Administrative Information" is defined as information that assists business with daily operations and "Internal Business Information" defines information that is created and maintained only for internal operating use and not required for regulatory compliance or to support a legal transaction. (For example, a contract supports a legal transaction and is not administrative or internal business information.)

Examples of Administrative Information or Internal Business Information include: department activities, such as: internal service requests, process improvement activities, work management documentation, internal quality reviews, staff meeting materials (arrangements, agendas, minutes and handouts).

Also defined as Working Records or Temporary Records; process conducted starting a new function, service or program or improving existing operations; when meeting minutes, status reports and other records of general project administration and oversight; for operational decision-making purposes; analysis, internal administration, or management information period of time; that activities and no value after a short records; and other tools used as reference or to generate procedures, standards and with regulated activities; other directives that are not associated materials, newsletters/periodicals, and professional association activities.

Retention: Completion of the business purpose, but not longer than 3 years after last use

Exception: Retain for 5 years in France.

4.2 FRANCHISE MANAGEMENT

Franchise Management records include: documents that support the Company's relationship with its franchise operators. Information types include agent relationship development, background checks, franchise contracts, service agreements, credit initiation, agent relationship maintenance, and negotiations, and franchise service manuals.

Retention: End of franchise relationship plus 10 years; Australia: Background checks and due diligence on non-bank, credit union / ADI Franchise's retain for life of relationship + 10 years.

4.3 COMMUNICATIONS

Information that is generated by the Company, depending upon the audience who receives it. E-mail or communications that may also fall under another Company Policy (email) or category defined in this Schedule must be retained for the retention period for that content and category type.

4.3.1 INTERNAL COMMUNICATIONS – NON-EXECUTIVE

Information types include routine employee communications not related to specific business transactions or policy decisions, routine communications that have no value after a short period of time, general e-mails, administrative announcements, Q&A documents, weekly reports, and weekly media collections for reference.

Retention: Maximum of 3 years from date of publication

Exception: France: Retain for 5 years

4.3.2 INTERNAL COMMUNICATIONS - EXECUTIVE

Information types include board briefings, business briefings, council updates, and corporate committee meeting minutes.

Retention: Permanent

Exception: All distributed board or committee meetings materials, including drafts or copies printed or electronic materials and meeting notes or minutes must be destroyed within 90 days of each meeting. The corporate governance team may retain electronic or paper copies of final materials for up to 2 years only in cases that do not contain notes or other comments not included in the final distributed materials. (Ref. Board of Directors Materials Policy Section 4.6.1)

4.3.3 CORPORATE EXTERNAL COMMUNICATIONS

Information types include official press releases, executive speeches, other corporate communications to external parties, and publications not pertaining to any other functional category of information.

Retention: Retain for 10 years from date of publication

Exception: Information that has historical value to the Company, retain permanently (Refer to Section 4.6.1)

4.4. BUSINESS & CONSUMER SERVICES

The term, "Business & Consumer Services" generally describes six functional sub-categories of information that is generated from the Company's service offerings. NOTE: Retention of data subject credit card information must be retained pursuant to the Cardholder Data Retention Procedure and Payment Card Industry standards.

4.4.1 MONEY TRANSFER

Transactional records related to traditional money transfers, mobile money transfers, on-line transactions, or options (where applicable); record types include electronic data elements maintained in Company transactional systems of record; completed paper based forms, transactional receipts and supporting documents. As examples of money-transfer related records, this category includes records, records of identity and verification ("KYC"), currency denominated, date, parties, facility (franchise location or on-line). (Also see Section 4.9 Legal as Subpoena request in some countries qualify as MT documents)

Retention: Money Transfer Forms:

United States and Canada, completion of the transaction + 6 months;

International, completion of the transaction + 7 years

Electronic Transactional Record:

United States and Canada, completion of the transaction + 5 years,

International, completion of the transaction +7 years

Identity & Verification (KYC) Documents: completion of the transaction + 7 years,

Exception:

New Zealand, Poland, United Kingdom, State of Arizona, completion of the transaction + 5 years

Australia; On-line customer validation records, life of relationship + 7 years

Hungary, completion of the transaction +8 years

India, Switzerland, Italy, Spain, Mexico, Turkey, Saudi Arabia, France, Bhutan, Portugal, Morocco, Latvia, Lithuania, Czech Republic, Norway, Finland; completion of the transaction + 10 years

4.4.2 PAYMENT AND PREPAID SERVICES

Transactional records of Company Payment Services, record types include electronic data elements maintained in Company transactional systems documents establishing business relationship, records of "know your client/customer" identity and verification, nature of transaction, currency denominated, date, parties, facility, agents involved, and suspicious-activity filings.

Retention:

Electronic Transactional Record, United States; completion of the transaction + 5 years, International including Canada; completion of the transaction + 7 years

Identity & Verification (KYC) Documents, completion of the transaction + 7 years,

Exception:

Singapore, Malta, New Zealand date of last activity + 5 years

India, Mexico, Saudi Arabia, Spain, Switzerland, Italy; completion of the transaction + 10 years

4.4.3 RETAIL MONEY ORDER

Information types include: Company-branded retail money order products and Money Order Logs maintained by agents.

Retention:

Retain transaction records and supporting customer identify and verification information for 7 years after completion of the transaction.

Retain Money Order Logs for 5 years

4.4.4 CARD HOLDER DATA

Retention:

Retain for a period not to exceed 7 years

Exceptions:

None

4.4.5 CONSUMER COMPLAINT RESPONSES

Consumer complaint response for all Company services outlined in 4.4, including National Association of Attorney General “NAAG” files / complaints

Retention:

Retain for a period of 3 years

Exceptions:

Ireland: Retain for a period of 6 years

4.4.6 CUSTOMER DATA

Information types include information collected during customer or client enrollment for promotional activities, membership programs and are transferred to the Unified Customer or Marketing Databases

Retention:

Retain for 4 years from date of last activity

4.5. FINANCE

The term “Finance” generally describes six functional sub-categories of records and information that are generated through the management of the Company’s finances.

4.5.1 ACCOUNTING

Information types include journals/ledgers; journal entry support; accounts payable (including W8 & W9 documents); accounts receivable; payroll processing; tuition and expense reimbursements; canceled checks; check registers; transfers between accounts; transfer pricing calculations; reconciliation of accounts, ledgers, sub ledgers, balance sheet accounts; capital property; investments; inventory; and other official accounting records and supporting documents. Also includes final accounting transaction reports and data. Also includes import and export records.

Retention:

Retain for the current year plus 10 years

Exception:

General Ledger: Argentina, retain for 10 years after close of business and China retain for 15 years

Accounting documents: Retain Bangladesh 12 years;

Phone bills: Retain for 5 years

4.5.2 EXTERNAL FINANCIAL REPORTING - ANNUAL REPORTS LISTED IN THE DESCRIPTION

Information types include annual financial statements prepared for or provided to external parties, including audited GAAP financial statements (e.g., operating statement, balance sheet, trial balance, etc.), annual CPA audit report, 10-K filings with the SEC (and similar annual reports required by other jurisdictions), and annual report to shareholders. Also includes work papers used to generate these reports.

Retention:

Retain the final version of these annual financial statements and annual financial reports permanently

Retain work papers for the current year plus 10 years

4.5.3 EXTERNAL FINANCIAL REPORTING - OTHER

Information types include records stating the financial condition of the company that are prepared or provided to external parties and are not specifically listed in Section 4.5.2, above. Includes GAAP reports, SEC filings, earnings press releases, general financial computations prepared for release to external parties and work papers related to financial reporting preparation or financial audit. Also includes work papers used to generate these reports.

Retention:

Retain for the current year plus 10 years

Exception:

Argentina, retain for 10 years after close of business

4.5.4 INTERNAL FINANCIAL REPORTING

Information types include internal budgets, forecasts, business cases, and other financial analysis and financial calculations supporting internal management review and decision-making.

Retention:

Retain while useful for internal operations or reference, but not longer than 10 years after created

4.5.5 TAX

Information types include final income tax returns, work papers, planning, forecasts, property tax returns, transfer files, sales & use tax returns, copies of checks used to pay taxes and return receipt and certified mailers, tax provision files and due diligence.

Retention:

Current year plus 10 years

Exception:

Retain tax opinions, filed federal and state income tax /franchise tax returns, due diligence for closed acquisitions, audit closing agreements and records of final income tax determinations, and tax basis and/or E&P calculations retain permanently only in the system of record.

For Foundation's, retain non-profit entity tax returns permanently only in the system of record.

4.5.6 ESCHEATMENT/ABANDONED PROPERTY RECORDS

Information types include documents concerning the escheatment of property to state governments, including abandoned property payouts, returns, working papers and due diligence.

Retention:

Retain for 20 years

Exception:

Retain for 30 years for France, French Polynesian

4.6. GOVERNANCE

The term "Governance" generally describes five functional sub-categories of records and information, as follows.

4.6.1 CORPORATE SECRETARY ACTIVITIES

Information types include information of historical value, corporate formation documents, Secretary of State or provincial filings, charters, corporate record books, stock ledgers, shareholder voting, proxies, SEC filings (excluding financial reports described in Section 4.5), Section 16 reports, codes of conduct, corporate financing instruments (revolving credit agreement, bond indentures, commercial paper agreements, line of credit agreements, interest rate and foreign exchange hedging agreements, and related documents), Board and Executive Committee meeting minutes, and business unit performance files.

Retention:

Retain permanently, final proxy reports and summaries permanently

Exceptions:

Loan documentation: Retain for termination of the loan plus 10 years

Shareholder voting records: Retain for date of creation plus 10 years

Proxy cards: Retain for date of election plus 10 years.

4.6.2 COMPANY LICENSES

Information types include any state, federal, or country-issued licenses to conduct business.

Retention:

Retain for duration of license plus 10 years

Exceptions:

Retain Franchise Pre-Approvals Applications (licenses) for 7 years

4.6.3 GOVERNMENT, REGULATORY & COMPANY COMPLIANCE PROGRAMS

Information types include documentation of Company compliance programs that have been designed, implemented and enforced to prevent and detect violations of the Company's code of conduct standards. Includes program documents, implementation records, assessments, and regulatory reporting in areas such as OSHA, SOX, GLB, privacy, information security (plans, tests, forensic reports, incident response reports, encryption keys,), physical security, PCI, EU9546, PIPEDA, SAS70, records management, diversity, etc.

Documents that are considered records include; certifications, fraud (Operator & Consumer) reports, regulatory audits or reports, agreements with government agencies (e.g., regulatory consent orders, sanctions and obligations, permissions, interpretations, determinations or exempted relief), antitrust investigations, submissions to government agencies and internal audit reports/action plans.

Retention:

Retain regulatory submissions for 7 years from the date of submission, or until the activity has been completed plus 7 years

Exceptions:

Retain until close of activity plus 7 years

Retain agreements with government agencies, antitrust permanently

Bank Correspondence: Retain for 5 years

Encryption Keys: archived and online) for the life of the encrypted data plus 1 year

Retain encryption key custodial acceptance agreements for the life of the key plus 5 years

Retain visitor logs, access control and reports for 1 year centers/rooms that process or store card holder data (PCI requirement)

Retain CCTV premises video recordings for 30 days for all offices except, Italy, Netherlands, retain for 24 hours; Austria, retain for 72 hours; Czech Republic, retain for 3 days; Malta retain for 7 days; Greece, retain for 15 days.

OSHA / Health & Safety: years; and injuries resulting from toxic substance exposure for 30 years

Retain records of occupational illness for 50 years

OSHA records for minor job related issues for 45 years

Records of health and safety trainings for 10 years

Lithuania, retain OSHA records for fatal or severe job related injuries for 75 years;

Canada retain recording and reporting of hazardous health and safety occurrence investigations for 10 years

4.6.4 AML COMPLIANCE

Information types include: regulatory reports such as suspicious activity/transaction reports and large currency transaction reports; regulatory filings (e.g., OFAC, BSA, FinCEN, Fintrac, Austrac, etc.); associated consumer and agent transaction data; agent or business subscriber application and due diligence investigative materials; new and existing product information and approvals; policies, program manuals and procedures; risk assessment documentation; and compliance auditing documentation.

Retention:

United States, retain for 7 years, International, retain for 10 years

SARs / CTRs, Large Currency Transaction Reports – retain for 5 years

Mexico Reports of Unusual Opportunities – retain for 10 years

OFAC Sanction Country Reports – Cuba, Sudan, Syria, retain for 5 years

Exceptions:

Australia, Canada and Germany, retain for 7 years

New Zealand and France for 5 years

India SARs retain for 10 years

4.6.5 POLICIES, STANDARDS, PROCEDURES AND TRAINING

Information types include official, approved operating policies and procedures of the Company (corporate secretary activities, disaster recovery, finance and human resources operations, government and media relations, and procurement, etc.) and training records.

Retention:

Retain final documents for regulated activities and corporate programs (e.g., code of conduct, health and safety, ethics, privacy, records management, information security, anti-money laundering, fraud prevention, sexual harassment prevention, etc.) for 10 years after expiration

Exception:

Retain final documents related to activities that are NOT regulated by an external body (e.g., disaster recovery, professional development training, etc.) while useful for internal operations or reference, but not longer than 3 years after last use

4.6.6 CALL CENTER OPERATIONS

Information types include consumer service support documents and data that are created in the course of conducting call center operations.

Retention:

Retain call center operations records that are not required for regulatory compliance while useful for internal operations or reference, but not longer than 5 years

4.7. HUMAN RESOURCES

The term "Human Resources" generally describes five functional sub-categories of record and information that are generated in the hiring, management and compensation of the Company's employees.

4.7.1 BENEFITS

Information types include health and wellness plans and administration, short-term and long-term disability plans and administration, workers compensation records, requests for medical leave, and defined benefit (pension) and 401(k) plans and administration.

Retention:

Retain 7 years after termination

Exception:

Retain pension plan documents until financial obligations expire plus 7 years

Retain records of medical and dental claims related to the provision of coverage for U.S. employees for the current year of the record plus 6 years

Lithuania, retain maternity leave records for 50 years from end of employment; retain attendance sheets, unpaid leave, educational

4.7.2 PERSONNEL

Information types include on-boarding documents, employment contracts, certifications, performance appraisals and awards, and termination records.

Retention:

Retain for 7 years after employee termination

Exceptions:

For employees with defined benefit pension benefits, retain records until final pension payment to employee or beneficiary plus 7 years

Argentina, retain for 10 years after employee termination; France, retain for 100 years from the birth of the employee; Romania and Poland, retain for 50 years from end of employment; and Russia retain for 75 years from end of employment

Lithuania: retain for 50 years; retain records on investigation of dereliction of duty and disciplinary actions for 5 years

Retain expatriate and relocation files for 7 years after repatriation

4.7.3 EMPLOYEE SELECTION & RECRUITMENT

Information types include job orders submitted to employment agencies, job applications, resumes, selection criteria, and employment testing.

Retention:

If hired, transfer records of the selected/hired employee to his/her Personnel File; see Section 4.7.2, above If not hired, retain candidate resumes and applications and other recruitment records for a period no longer than 2 years from the date of the non-hire decision

Lithuania, if not hired, retain candidate resumes, applications and recruitment records for 1 year

Exceptions: Retain job descriptions for as long as the position exists plus 6 years

4.7.4 EMPLOYMENT COMPLIANCE

Information types include affirmative action programs, EEO-1 and EEO-2 employer reports, and U.S. Employment Eligibility Form I-9 compliance. (Refer to Section 4.6.3, "Government and Regulatory Compliance" for health and safety compliance, e.g., OSHA.)

Retention:

Retain employment compliance reports for 3 years

Exceptions:

France retain for 5 years

For U.S. Employment Eligibility Form I-9: Upon termination, retain I-9 for 3 years after the date of hire or 1 year after the termination date, whichever is later

4.7.5 SALARY ADMINISTRATION

Information types include payroll administration, employee payroll tax forms, wages and salary structures, compensation standards, and national salary surveys. Also see 4.5.1, "Accounting," for payroll processing records.

Retention:

Retain for the current year plus 7 years; Italy retain for 10 years

Exception:

Argentina, retain for 10 years from the close of business; Lithuania and Poland, retain for 50 years from end of employment

4.8. INFORMATION TECHNOLOGY

The term "Information Technology" generally describes the functional category of records and information types that are generated in the selection, installation, maintenance, and retirement of the Company's IT systems, which include: business continuance documents, access control authorizations and reports, audit logs, incident and change management reports, manuals, project management, service requests, service notifications, source code, network diagrams, configuration reports, and technology vendor management.

Retention:

Retain for 3 years after superseded, Retain Alerts for 30 days online.

Exception:

France retain for 5 years

Retain audit logs for 90 days online, and in an archive for up to 1 year from the date of audit, Spain for 2 years

Retain system lifecycle documentation until the system is decommissioned, the documentation is no longer relevant to current operations or to existing data, including data on offline media that has been migrated or converted

Retain specified audit logs as identified by Legal or Security for the period set forth in the legal request

Retain phone logs for 3 years

Retain RSA/DLP Audit log reports for 1 year

HFM/Treasury Systems deactivated users retain for 1 year

SourceFire alerts will be retained up to 1 million alerts then purge

4.9. LEGAL

The term, "Legal" generally describes five functional categories of records and information that are generated in the course of providing legal services for the Company.

4.9.1 LITIGATION

Information types include records of claims in litigation, records of claims not in litigation, criminal investigations, subpoenas, consumer fraud and third party requests (law enforcement request).

Retention:

Retain until the close of activity plus 7 years

Exceptions:

Retain third-party requests for 5 years from close of action

4.9.2 GENERAL COUNSEL

Information types include settlement agreements, general agreements (contracts), and opinions and advice on business/legal matters and risk management issues, and governmental (regulatory and court) orders and communications.

Retention:

Retain closure or expiration of the agreement or activity plus 10 years

4.9.3 MERGERS AND ACQUISITIONS

Information types include final merger documents contained in the original legal file for completed mergers and acquisitions. NOTE: The terms of non-disclosure agreements may dictate separate, binding retention requirements for materials provided to facilitate merger and acquisition activities.

Retention:

Retain records of successful deals permanently

Exception:

Terminated deals: Contact the GCO prior to destruction to secure approval to shred or purge all paper documents or electronic data within 60 days of the termination

4.9.4 EMPLOYMENT

Information types legal include opinions and advice on employee matters, union relations, and benefits.

Retention:

Retain until the close activity plus 10 years

4.9.5 INTELLECTUAL PROPERTY

Information types include patents, trademarks, copyrights, and supporting documents.

Retention:

Retain permanently

4.10. MARKETING AND BUSINESS DEVELOPMENT

The term “Marketing and Business Development” generally describes two functional sub- categories of records and information that are generated in the promotion or growth of the Company’s service offerings.

4.10.1 PROSPECTS

Information types include prospect management, proposals, market research, trending, and analysis of business transaction and customer data.

Retention:

For prospective business, retain records for 7 years.

Once the business is sold, refer to Section 4.4 Business & Consumer Services

Exception:

Retain market research for 10 years

4.10.2 MARKETING MATERIALS

Information types include campaign and incentive program materials, promotional materials, and advertising.

Retention:

Retain for the duration of the campaign plus 6 years

4.11 FACILITIES & OFFICE SERVICES

The term, "Facilities & Office Services" generally describes three functional categories of records and information that are generated by the company, based upon the following subjects or activities. NOTE: Refer to Section 4.6.3, "Government, Regulatory & Company Compliance Programs" for all types of compliance programs, including Security, Privacy and Records & Information Management.

4.11.1 FACILITIES

Information types include facility design and construction documentation, as-built drawings, provisioning, telecommunications and other infrastructure services, OSHA and other health and safety documentation.

Retention:

Retain for the life of plant or end of lease plus 30 years

Exceptions:

Retain routine maintenance and service requests and routine repair records while useful for internal operations or reference, but not longer than 5 years

4.11.2 INSURANCE

Information types include insurance policies and certificates, and related coverage documentation.

Retention:

Permanent

Exception:

Retain records with short-tail coverage's, such as auto policies, until expiration plus 7 years

Retain insurance claim and activity records until 7 years after close of activity

4.11.3 PROCUREMENT/PURCHASING

Information types include bid documents, contracts, agreements, fleet management, and purchase orders or requisitions.

Retention:

Retain for 10 years after closure or expiration of project

5. PRINCIPAL, APPROVALS AND REVIEW

Principal:

Approvals:

Review: The retention schedules will be reviewed on an annual basis by IG and business unit owners, and updated as required to align with changes to the business, the regulatory environment, or applicable laws.

6. DOCUMENT VERSIONS AND DATES

Document Version & Dates: