

# Data Retention and Destruction Policy

## Objective

GiveWell strives to manage data in a balanced manner that both preserves all information necessary for effective and ethical business operations and minimizes the preservation of personal data to the extent possible consistent with our legal and business obligations. This policy establishes rules for retaining and destroying data in our possession.

## Terms

### Record retention

Records will be maintained for the periods sufficient to satisfy IRS regulations, federal grant requirements, if applicable, federal, state and local laws, and other legal needs as may be determined. GiveWell's records are retained, in either electronic or paper format, according to the schedule below, in compliance with government, legal, and funders' requirements. When there is a conflict between federal, state and local record retention requirements, the longer retention period prevails. Certain important records, as determined by the Board, will be retained permanently, even if their retention is not required by law.

Type of Document	How Long to Retain (Electronic Format)
<b>Accounting</b>	
Accounts payable ledgers	7 years
Accounts receivable ledgers	7 years
Annual reports	7 years
Annuity gift agreements	Indefinitely
Audited financial statements	Indefinitely
Bank deposit records	7 years
Bank reconciliations	7 years
Bank statements	7 years
Canceled checks (ordinary)	7 years
Canceled checks (taxes, property and important payments)	7 years

Contributions/donations/grants (unrestricted)	Indefinitely
Contributions/donations/grants (temporarily restricted)	Indefinitely
Contributions/donations/grants (perm. restricted/endowment)	Indefinitely
Expense analyses/distribution schedules	7 years
Fixed asset records, appraisals, depreciation schedules	7 years
Internal audit reports	Indefinitely
Invoices (to customers/from vendors)	7 years
Life income agreements (e.g. charitable annuities)	Indefinitely
Physical inventory records	7 years
Purchase orders	7 years
Requisitions	7 years
Shipping and receiving reports	7 years
Subsidiary ledgers	7 years
Tax returns (IRS form 990) and worksheets	Indefinitely
Vouchers for payment to vendors, employees and others	7 years
Withholding tax statements (W4's)	7 years
<b>Corporate</b>	
Charters, constitutions, bylaws	Indefinitely
Contracts, mortgages, notes and leases (expired)	Indefinitely
Contracts still in effect	Indefinitely
Deeds, mortgages, bills of sale,	Indefinitely
Incorporation records, 501(c)(3) determination	Indefinitely

Loan documents, notes	7 years after payment is completed
Licenses	Indefinitely
Minutes from board meetings	Indefinitely
Patents and related papers	Indefinitely
Trademark registrations and copyrights	Indefinitely
<b>Personal (Donors and other stakeholders)</b>	
Contact information (e.g. phone, email, address)	As long as required or allowed by applicable law
Correspondence between you and GiveWell	As long as required or allowed by applicable law
Demographic information (e.g. gender or age)	As long as required or allowed by applicable law
Device details (such as IP address, web browser user-agent information)	As long as required or allowed by applicable law
Donation history	As long as required or allowed by applicable law
Personal interest and affiliation information	As long as required or allowed by applicable law
<b>Personnel</b>	
Employment applications (not hired)	6 years or as long as required by applicable law
Garnishments	6 years or as long as required by applicable law
I-9's (after termination)	3 years from date of hire; 1 year from end of employment, whichever is later
Payroll records and summaries	Indefinitely
Personnel files (after termination)	6 years or as long as required by applicable law
Retirement and pension records	6 years or as long as required by applicable law
Time sheets	6 years or as long as required by applicable law

<b>Insurance</b>	
Accident reports and claims	25 years
Fire inspection reports	25 years
Group disability reports	25 years
Insurance records (expired contracts)	25 years
OSHA logs	25 years
Worker's compensation documentation	25 years
<b>Other documents</b>	
Other documents as required by law	Indefinitely or until legal necessity has been exhausted.

## Record destruction

Once the retention period has expired, GiveWell may destroy the records in a manner that preserves the confidentiality of its contents. Record destruction is performed by authorized personnel who are responsible for maintaining all Certificates of Destruction.

Upon receipt of any legal notice, GiveWell will cease all relevant record destruction until the end of the investigation, if any.

## Review of policy

Record retention requirements are reviewed annually with the Board and independent auditors to determine any necessary changes.

## Effective Date

March 1, 2022

## Additional Resources

More information on personal information we collect and how we process it is available in our [Privacy Policy](#).

Effective Date: March 1, 2022

## Point of Contact

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