



Records Management Policy

Effective Date: June 15th, 2018

Introduction

AgentRisk is committed to complying with the provisions of the Investment Advisers Act of 1940 and the rules under the Advisers Act as well as the EU's General Data Protection Regulation. To this end and as fiduciaries of our clients, we have developed an extensive Code of Ethics, as well as other policies which all team members must comply with, including this policy.

Information is a corporate asset and our records are important sources of administrative, evidential and historical information.

This Policy sets out our commitment to achieving high standards in records management.

Purpose

By adopting this policy we aim to ensure that our records are accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- help us carry out our business;
- help us to make informed decisions;
- protect the rights of employees, regulated entities, and the public;
- track policy changes and development;
- make sure we comply with relevant legislation;
- provide an audit trail to meet business, regulatory and legal requirements;
- support continuity and consistency in management and administration;
- make sure we are open, transparent and responsive;
- support research and development; and
- promote our achievements.

Scope

This policy applies to the management of all documents and records, in all technical or physical formats or media, created or received by the Company in the conduct of its business activities. It applies to all staff, contractors, consultants and third parties who are given access to our documents and records and information processing facilities.

Policy

The company operates on a need-to-know basis, especially when it comes to accessing non public information. To achieve that we have implemented a detailed procedure for controlling and keeping records of who has access to what and for how long.

It is the Company's policy to only keep records only of what is absolutely necessary for us to be able able to provide our service(s) effectively and to remain compliant with all applicable laws and regulations regarding record keeping.

Additionally, it is the Company's policy to not keep any records longer than required by applicable laws and regulations. Once the necessary retention period for each record expires, the company will take steps to safely delete the record, unless under specific circumstances where the record might need to be preserved for longer. An example of such a circumstance may occur if the company is in the process of researching a client complaint / working with the authorities etc.

Responsibilities

The Data Protection Officer is responsible for developing the Policy in cooperation with the CTO and CCO, and will be responsible for promoting, implementation, maintaining and monitoring records management.

The DPO with the assistance of the CCO and CTO will:

- ensure records are held on the most appropriate medium for the task they perform
- ensure records are held for the appropriate period of time, according to applicable laws
- review records that have reached their retention period
- confidentially destroy with appropriate documentation those records that have reached the end of their retention period

All employees will be responsible for creating and maintaining records in relation to their work that are authentic and reliable.

The DPO is also responsible for reviewing this policy and its implementation regularly, as well as reporting their finds to CCO and CTO.

Compliance

Failure to comply with this or any other policy will result in disciplinary actions as per the Sanction Policy. Legal actions also may be taken for violations of applicable laws and regulations.

References

[Investment Advisers Act of 1940](#)

[AgentRisk Code of Ethics](#)

[AgentRisk Compliance Manual](#)

[AgentRisk Sanction Policy](#)

[General Data Protection Regulation](#)

Contact

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Policy History

Initial effective date: June 15th, 2018