

Archiving Policy

Introduction and Commitment

Capital Sky Ltd is committed to ensuring that all records are archived, stored, and retained in accordance with defined company procedures, applicable retention schedules, and all relevant legal, regulatory, and contractual requirements.

This policy applies to all employees, subcontractors, consultants, and any individuals handling records on behalf of Capital Sky Ltd.

Purpose

The purpose of this policy is to ensure that records are archived securely, systematically, and consistently across the organisation. It ensures compliance with statutory retention requirements, protects information against loss or unauthorised access, and supports operational efficiency, audit readiness, and legal defensibility.

This policy should be read in conjunction with Capital Sky's Cyber Security Policy, Data Protection Policy, and Confidential Information Policy.

Scope

This policy applies to all records created or held by Capital Sky Ltd. This includes, but is not limited to, hard copy documents, digital files, emails, project records, HR and personnel files, financial and commercial documentation, health, safety and environmental records, and subcontractor or supplier records.

Archiving Requirements

All physical and digital records must be archived in a controlled and secure manner.

Hard copy records must be stored in secure, locked locations with access restricted to authorised personnel only. Documents must be clearly labelled to ensure traceability and efficient retrieval when required. Sensitive or confidential records must be stored in designated secure storage areas.

Digital records must only be stored on approved Capital Sky systems, including SharePoint, OneDrive, or secure company servers. Records must not be stored on personal devices, personal email accounts, or unauthorised cloud platforms.

All archived digital records must be protected using appropriate security controls, including encryption, role-based access restrictions, and secure backup systems.

Retention and Disposal

All records must be retained in accordance with Capital Sky's Record Retention Schedule, which defines minimum retention periods based on legal, regulatory, and operational requirements.

No records may be destroyed before the expiry of their retention period. Where records are subject to audit, investigation, dispute, or legal hold, they must be retained until formal authorisation for release is confirmed.

Once records reach the end of their retention period, disposal must be carried out securely and in accordance with company procedures. Hard copy records must be shredded or destroyed using

approved confidential waste processes, and digital records must be permanently deleted using secure deletion methods that prevent recovery.

Where required, all disposal activity must be recorded to maintain an audit trail.

Responsibilities

All employees and subcontractors are responsible for ensuring that records within their control are archived correctly, stored securely, and managed in accordance with this policy.

Managers are responsible for ensuring team compliance, overseeing archiving practices within their area, and authorising access to archived information where required.

The Compliance or Data Protection Lead is responsible for maintaining the Record Retention Schedule, overseeing archiving standards, and ensuring compliance with [GDPR UK](#), the [Data Protection Act 2018](#), and applicable cyber security requirements.

Confidentiality and Security

All archived records must be handled in accordance with the [Data Protection Act 2018](#), [GDPR UK](#), the Cyber Security Policy, and the Confidential Information Policy.

Any unauthorised access, misuse, loss, or disclosure of archived records must be reported immediately in line with company procedures and may result in disciplinary action.

Policy Review

This policy will be reviewed annually, or sooner where required due to changes in legislation, regulatory requirements, client requirements, or operational needs.

Name: Martin Maloney

Position: Chief Executive Officer

Signature:



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