

RECORD RETENTION POLICY

Version History

Version	Date	Author	Description
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I. INTRODUCTION

Infosys Limited and its subsidiaries (collectively referred to as “Infosys” or the “Company”) maintain a significant amount of information critical to its business operations, which necessitates effective retention and storage of this information. This policy sets out Infosys’ approach towards retention of information collected by it in the course of its operations.

II. SCOPE

This policy applies to all records, which term refers to any data whether in electronic or physical form, that is collected, created, and maintained by all Infosys departments, teams and functions for conducting business activities, including personal information of individuals. Client data may be outside the scope of this policy depending on the requirements set out in the relevant contract.

III. RECORD RETENTION

III.1. Grounds for Retention

Infosys seeks to hold records where necessary for its legitimate purposes such as:

- Complying with applicable obligations under relevant laws, rules, and industry-imposed regulations it may be subject to, given the nature of its operations, that specify the types of information which need to be retained and for how long. Examples include mandatory record keeping and reporting requirements under financial and corporate laws, and prevention of fraud and abuse.
- Management of disputes and litigations, investigations whether internal and external, responding to legal requests or inquiries from regulatory authorities including orders to preserve information.
- Business related purposes arising out of Infosys’ operations, such as security purposes and ensuring business continuity.

Given that these requirements can vary based on the type of information and reason for collecting and processing the same, actual retention periods may also vary accordingly.

III.2. Setting Retention Periods

The Company’s aim is to retain records only as long as necessary for relevant purposes, as further retention could expose it to potential non-compliance and the resulting consequences. It therefore seeks to achieve a balance between record retention mandates under various applicable laws, and the principle of data minimization underlying most data protection and privacy rules and regulations. This in turn requires preserving company information in line with regulatory standards and disposing it off appropriately once such retention requirements cease to apply.

Determining the retention period for a particular record involves an assessment of the reason for its collection including whether a specific retention period is mandated, as well as whether such record includes personal information.

Apart from this overarching policy, there may be other policies or guidelines in place to address specific requirements under a particular legislation or pertaining to a specific department or group company.

In case of any conflict between multiple retention requirements, the longer retention period will apply.

III.3. Data Subject's Rights

Where applicable, Infosys shall comply with a data subject's requests for erasure of personal data, as per Infosys policies and regulations within the pre-defined timelines under local law of the land, unless such obligations to retain the data is for compliance with legal obligations required under applicable privacy laws and regulations, or as per minimum statutory durations, and or to continue to defend Infosys against any claims, disputes, potential or actual litigation proceedings.

III.4. Storage & Disposal

- Records will be held securely in line with reasonable and appropriate security practices which include administrative, physical, and technical controls.
- Infosys will make efforts to dispose of records held once the stipulated period comes to an end, unless there is a specific requirement to continue retention e.g., in case of an ongoing litigation or investigation.
- Disposal shall be conducted as allowed by applicable laws and as per Infosys' policies and procedure, with the intent of ensuring data is safely and completely removed from Infosys' systems.
- Techniques may include but are not limited to tool based automatic deletion, encryption with irreversible deletion of key, anonymization, cross-cut shredding of hard copies, degaussing of hard disks, and so on, depending on the medium where data resides. This deletion of records from various Infosys systems may take an appropriate time.
- In case of data subject's request for erasure of its personal data, the deletion shall take place without undue delay but in any event within one month of receipt of the request.
- Further, encrypted copies will be held in secure backup archives for an additional period of 3 months for business continuity reasons in case data was removed unintentionally or needs to be recovered for a valid purpose. Copies shall not contain personal data if the data subject has requested erasure of such personal data.
- Where applicable, any personal data archived and retained with prior approval from the Data Privacy Office shall be maintained with necessary safeguards implemented by the relevant process owners.

In case of any questions or clarification please reach out as follows:

- For information on Infosys privacy practices regarding your personal information collected and processed by it, please write to privacy@infosys.com.
- For information relating to records maintained by the respective business functions at Infosys, please raise an AHD with the concerned business function.