



# Document Retention and Destruction Policy

## 1. Purpose

This policy establishes formal standards for the retention, storage, protection, and destruction of records of Antumbra Collective, a private foundation recognized under Section 501(c)(3) of the Internal Revenue Code. This policy is adopted in accordance with applicable federal and Colorado law, including IRS disclosure and public inspection requirements applicable to private foundations.

## 2. Records Custodian

The Secretary of Antumbra Collective shall serve as Records Custodian and shall be responsible for oversight of document retention, secure storage, destruction procedures, and compliance monitoring.

## 3. Storage Format

Official records shall be maintained in digital format within the organization's secure shared cloud-based document repository. Signed paper originals shall be maintained by the Secretary in physically secure storage. Documents posted publicly shall contain redacted signatures to mitigate fraud risk.

## 4. Backup and Security

The organization shall maintain strong digital security practices including multi-factor authentication, encrypted storage when available, redundant cloud backups, restricted access controls, and periodic review of repository permissions. Physical copies shall be stored in secure, access-controlled locations.

## 5. Litigation Hold

In the event of pending or reasonably anticipated litigation, audit, investigation, or governmental inquiry, the Records Custodian shall immediately suspend any scheduled destruction of relevant records until resolution.

## 6. Public Disclosure Compliance

The organization shall comply with IRS public inspection requirements applicable to Form 990-PF filings and exemption documentation. Required documents shall be retained permanently.

## 7. Email, Text, and Electronic Communications

Organizational emails, text messages, and electronic communications related to governance, financial decisions, contracts, grants, or compliance shall be preserved in the digital repository. Electronic metadata shall be preserved when reasonably practicable.

## 8. Social Media and Digital Content

Official social media communications and public digital statements related to governance or programmatic activity shall be archived in a manner consistent with this policy.

## 9. Disaster Recovery

The organization shall take reasonable steps to ensure continuity of records in the event of system failure, cyber incident, or physical disaster.

## 10. Retention Schedule

The following retention periods shall apply unless otherwise required by law. Digital records shall not be destroyed. Paper copies may be destroyed following board authorization and compliance with minimum legal retention standards.

Record Type	Retention Period
Articles of Incorporation, Bylaws, IRS Determination Letter	Permanent
Form 990-PF and Supporting Documents	Permanent
Board Minutes and Resolutions	Permanent
Financial Statements and Bank Records	Minimum 7 Years
Grant Agreements and Program Files	Minimum 7 Years After Completion
Contracts	Minimum 7 Years After Expiration
Insurance Policies	Permanent
Employment and Contractor Records	Minimum 7 Years After Separation
Volunteer Records	Minimum 7 Years

## 11. Destruction Procedures

Paper records eligible for destruction shall be destroyed only upon administrative determination by the Records Custodian, with disclosure of such action documented in board meeting minutes. Secure shredding shall be used for sensitive materials.

## 12. Policy Review

This policy shall be reviewed periodically to ensure continued compliance with evolving legal and governance standards.

## Board Adoption

This Document Retention and Destruction Policy was adopted by unanimous vote of the Board of Directors of Antumbra Collective on February 4, 2024.

REDACTED VERSION: A signed original of this policy is maintained in the official Antumbra Collective document repository under the custody of the Secretary. Signatures are not displayed publicly to mitigate fraud risk.

President: \_\_\_\_\_

Secretary: \_\_\_\_\_

Treasurer: \_\_\_\_\_