

COOSAW FUTURES, CORP.

Records Retention Policy

1. Purpose

This policy explains what records Coosaw Futures, Corp. keeps, for how long, and how they should be handled and eventually destroyed. It is written for Coosaw Futures' current stage as an all-volunteer, member-based nonprofit and is intended to be simple enough to follow without dedicated records or compliance staff.

2. Who This Applies To

This policy applies to Management Team members, committee members (including the Legal Affairs Committee), and any other agent who creates, receives, or has custody of Coosaw Futures' records in that capacity. It is not a policy for the general membership.

3. Records We Keep

The table below groups Coosaw Futures' records into a small number of practical categories. When in doubt about which category a record falls into, keep it for the longer of the periods that could reasonably apply.

Type of Record	Retention Period
Governing & Formation Documents (Articles of Incorporation, Bylaws, IRS Determination Letter, Form 1023 and related correspondence)	Permanent
Meeting Minutes (Management Team and Member Meetings)	Permanent
Financial Records (bank statements, ledgers, budgets, invoices, financial statements, tax filings)	7 years
Donation & Contribution Records (receipts, acknowledgement letters, in-kind valuation documentation)	7 years
Contracts & Agreements	7 years after termination
Insurance Policies & Contracts (D&O, professional services, etc.)	Permanent
Correspondence & Internal Communications	Same period as the document they support
Attorney-Client Privileged Communications	Permanent (subject to Litigation Hold)
Website & Social Media Content	No fixed schedule — see Section 6

4. Destruction Practices

- Once a record's retention period has passed, it should be destroyed promptly — paper records by shredding, electronic records by permanent deletion (not just moved to “trash” or “deleted items”).
- Destruction of any record must be approved in advance by both the relevant Management Team portfolio lead and the President.
- If a third party handles destruction on Coosaw Futures' behalf, get written confirmation that it was completed.
- No record may be destroyed while a Litigation Hold applies to it (Section 5), regardless of whether its normal retention period has passed.

5. Litigation Hold

Normal retention periods are suspended for any record that may reasonably relate to litigation, a government inquiry, a subpoena, or a formal dispute involving Coosaw Futures — in any format, including social media posts and text messages. This suspension (a “Litigation Hold”) can be triggered by the written direction of the retained counsel for the applicable matter or by the Management Team after consulting such counsel. The President, as

Legal Affairs, is responsible for notifying the Management Team and any relevant committee once a hold is in place. A hold stays in effect until the applicable counsel releases it in writing. The step-by-step mechanics of issuing and tracking a hold notice are kept in a separate internal Management Team procedure, so this policy doesn't need to be revised each time that process changes.

6. Attorney-Client Privilege

Communications with Coosaw Futures retained legal counsel about legal advice are privileged, confidential, and kept permanently (subject to the Litigation Hold provisions above), rather than tied to the retention period of whatever document they relate to. Access is limited to the Management Team and committee members with a direct need to know. Privileged communications should never be forwarded to the POA, the Declarant, the Architectural Review Board, or any other outside party, and should not be stored anywhere accessible to the general membership — doing so can waive the privilege. Because Coosaw Futures may at different times be represented by counsel retained for different purposes (for example, POA/ARB/Declarant matters versus nonprofit or tax matters), this protection applies separately to communications with each counsel about the matter they were retained for.

7. Website & Social Media

Content on Coosaw Futures' social media and other third-party platforms isn't practical to retain and destroy on a fixed schedule. Instead, the Communications lead maintains guidance for admins and moderators on what gets approved, edited, or removed in real time. If a post becomes relevant to official minutes, a POA/Declarant/ARB matter, or a member complaint, it should be captured (via a screenshot or export) into Coosaw Futures' records at that moment, rather than relying on it still being available on the platform later. This is also subject to the Litigation Hold provisions in Section 5.

8. Confidentiality

Coosaw Futures records are the property of Coosaw Futures, Corp. Management Team members, committee members, and other agents should keep records confidential and treat them as Coosaw Futures assets. Any subpoena, court order, or other external request for records must be directed to the President before any records are released. Any records in an individual's possession must be returned to the Management Team when that person's role ends.

9. Adoption & Amendment

This policy is adopted by a vote of the Management Team, with the vote and effective date recorded in the meeting minutes — no individual signatures are required. It may be amended in the same way, by a vote of the Management Team reflected in the minutes.

Adopted by the Management Team on: _____