

RECORD KEEPING POLICY

CREDIT GLORIOUS

PROPERTY HOLDINGS LTD.

DATA PROTECTION DEPARTMENT

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PREAMBLE TO THE RECORD KEEPING POLICY

We, at Credit Glorious Property Holdings Ltd., headquartered in London, hereby establish and adopt this Record Keeping Policy as a testament to our unwavering commitment to exemplary corporate governance, operational integrity, and legal compliance. Recognizing the critical role that accurate and efficient record management plays in the success and sustainability of our business, we are dedicated to upholding the highest standards in our record-keeping practices.

This policy is crafted in acknowledgment of the dynamic and complex nature of our business environment, where the effective management of records is not only a regulatory necessity but also a strategic asset. It is our belief that through diligent and systematic record keeping, we can ensure transparency, accountability, and efficiency in all our business dealings.

The principles and guidelines outlined in this policy are reflective of our dedication to maintaining a culture of integrity and precision. We understand that the records we create, maintain, and manage are not merely documents, but are the bedrock upon which the trust of our clients, partners, and regulatory bodies is built.

In adopting this policy, we commit ourselves to the continuous improvement of our record management processes, ensuring they remain robust, compliant, and aligned with the evolving needs of our business and the regulatory landscape. We recognize that this commitment is fundamental to our reputation, operational excellence, and the long-term success of Credit Glorious Property Holdings Ltd.

Through this policy, we empower and obligate all our employees, contractors, and agents to uphold these standards and contribute actively to the culture of meticulous and responsible record keeping. It is through our collective efforts that we will continue to thrive as a transparent, accountable, and trustworthy organization in the eyes of our stakeholders and the wider community.

ARTICLE 1. INTRODUCTION Purpose

The Record Keeping Policy of Credit Glorious Property Holdings Ltd. (hereafter referred to as "the Company"), with its headquarters in London, is designed to establish a standardized framework for the creation, retention, management, and disposal of records. This policy is pivotal in ensuring the Company's adherence to legal and regulatory obligations while supporting the effectiveness and efficiency of its business operations. It serves as a cornerstone for maintaining the integrity and reliability of the Company's documentation and information management.

Scope

This policy is universally applicable to all employees, contractors, and agents of the Company. It

encompasses all forms of records, irrespective of their medium, including but not limited to electronic documents, emails, paper files, and digital recordings. The policy covers the entire lifecycle of these records, from their initial creation or receipt to their final disposition. It is imperative that all personnel understand and adhere to these guidelines to ensure consistency and compliance across the organization.

ARTICLE 2. POLICY STATEMENT Commitment

The Company firmly commits to the maintenance of records that are accurate, complete, and readily accessible. This commitment is a fundamental aspect of our corporate governance, ensuring legal compliance and contributing to the operational efficiency of the business. The integrity of our records is crucial for making informed decisions, supporting business processes, and providing evidence of financial and legal transactions. The Company recognizes that systematic record keeping is not just a regulatory requirement but also a critical component of risk management and quality assurance in our operations.

ARTICLE 3. RECORD CREATION AND COLLECTION Accuracy and Completeness

The Company mandates that all records created or received in the course of business must accurately and completely reflect the transactions or events they document. This responsibility extends to all employees who are involved in the creation, handling, or management of these records. The accuracy and completeness of records are essential for ensuring they are reliable and can be trusted as a source of truth for business activities. Employees must take diligent care in recording information, ensuring that it is factual, detailed, and free from errors or omissions.

Timeliness

Timeliness in record creation is critical. Records should be generated at the time of the transaction or event they document, or as soon as is practicable thereafter. This practice is crucial for preserving the relevance and accuracy of the information. Delayed record creation can lead to inaccuracies, loss of context, or omission of vital information. The Company emphasizes the importance of prompt documentation to ensure that records serve as a contemporaneous and accurate account of business activities.

ARTICLE 4. RECORD CLASSIFICATION Categories

- Financial Records: These include all documents related to financial transactions, accounting, and audits. Examples are invoices, receipts, financial statements, and tax documents.
- Legal Records: Comprising contracts, agreements, legal correspondence, and litigation documents. These records are crucial for legal compliance and dispute resolution.
- Operational Records: Encompassing documents related to the day-to-day

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operations of the Company, such as project plans, reports, and operational procedures.

 Administrative Records: Including internal communications, meeting minutes, HR documents, and policy manuals. These records support the administrative functions of the Company.

Confidentiality Levels

- Public: Records that can be disclosed to the general public without any risk, such as press releases and public financial reports.
- Internal Use Only: Records meant for internal use, not to be disclosed outside the Company.
- Confidential: Information that, if disclosed, could harm the Company or its stakeholders, such as trade secrets and client information.
- Highly Confidential: Highly sensitive information, including legal documents, certain financial records, and personal data subject to stringent data protection laws.

ARTICLE 5. RECORD RETENTION Retention Schedule

- Short-term Retention: Records with a retention period of less than two years, often operational in nature.
- Medium-term Retention: Records retained for two to seven years, typically including financial and certain administrative records.
- Long-term Retention: Records that must be kept for more than seven years, often due to legal, historical, or archival value.

Preservation

- Physical Records: Stored in a controlled environment to prevent damage and deterioration.
- Electronic Records: Backed up regularly and stored in secure, encrypted formats to ensure data integrity and protection against cyber threats.

ARTICLE 6. RECORD STORAGE AND SECURITY Storage Solutions

- Physical Storage: Secure, access-controlled filing systems and archives for paper records.
- Electronic Storage: Use of secure, encrypted databases and cloud storage solutions for digital records, ensuring data integrity and protection against data loss.

Access Control

- Role-based Access: Access to records is granted based on job function and necessity, ensuring that employees only access information relevant to their roles.
- Security Protocols: Implementation of robust security protocols, including password protection, encryption, and regular security audits to prevent unauthorized access and data breaches.

ARTICLE 7. RECORD MAINTENANCE Regular Audits

Objective: The primary objective of regular audits is to verify adherence to the Record Keeping Policy and evaluate the effectiveness of current record management practices.

Audit Team: These audits are typically conducted by an internal audit team or an external auditor, depending on the company's policy and regulatory requirements.

Audit Process: The process involves a thorough examination of various types of records, checking for compliance with retention schedules, accuracy, and proper classification.

Corrective Actions: In cases where non-compliance or inefficiencies are identified, the audit findings are used to implement corrective actions and enhance record management procedures.

Updating and Review

Scheduled Reviews: The Company schedules periodic reviews of its records to ensure they remain relevant and accurate, reflecting the latest business activities and decisions.

Review Criteria: This includes verifying the accuracy of information, ensuring records are up-to-date, and assessing if any records need to be reclassified according to changes in business operations or legal requirements. Stakeholder Involvement: Different departments within the Company may be involved in the review process to provide expertise and ensure comprehensive coverage of all record types.

ARTICLE 8. RECORD DISPOSAL Secure Disposal

When records reach the end of their designated retention period, they undergo a secure disposal process to ensure that confidential and sensitive information is irretrievably destroyed.

Disposal Methods: This may include physical destruction, such as cross-cut shredding for paper records, and digital methods, like secure data wiping or degaussing for electronic records.

Environmental Considerations: The Company also considers environmentally responsible disposal methods, especially for physical records, aligning with its sustainability goals.

Documentation of Disposal

Disposal Records: A detailed log is maintained for each disposal action, documenting the type of records destroyed, the method of destruction, and the date of disposal.

Audit Trail: These logs serve as an important audit trail, providing evidence of compliance with the Record Keeping Policy and regulatory requirements. Accountability and Transparency: Maintaining these records ensures accountability in the disposal process and transparency in record management practices.



ARTICLE 9. COMPLIANCE AND MONITORING Legal Compliance

Regulatory Framework Adherence: The Company is committed to adhering to all relevant laws and regulations pertaining to record keeping. This includes the UK Data Protection Act, the General Data Protection Regulation (GDPR), and any other applicable international or local regulations.

Regulatory Updates: The Company stays informed about changes and updates in legal requirements to ensure ongoing compliance. This involves liaising with legal experts and regulatory bodies.

Compliance Checks: Regular compliance checks are conducted to ensure that record keeping practices align with current legal standards, including data protection and privacy laws.

Employee Training

Training Programs: The Company provides comprehensive training programs for all employees on record keeping responsibilities. These programs cover the importance of accurate and compliant record management, understanding the legal implications, and the role of each employee in maintaining these standards.

Ongoing Education: Refresher courses and updates on new regulations or company policies are provided regularly to ensure that all staff members are current with their knowledge and skills.

Training Effectiveness: The effectiveness of training programs is evaluated through assessments and feedback, ensuring that employees are competent in record keeping practices.

Monitoring and Reporting

Continuous Monitoring: The Company implements continuous monitoring mechanisms to ensure adherence to the Record Keeping Policy. This includes regular checks and audits of record management practices across different departments.

Reporting Mechanisms: Findings from monitoring activities, along with any issues or deviations, are reported to senior management. This ensures that management is aware of the effectiveness of record keeping practices and any areas needing improvement. *Corrective Actions:* Based on these reports, corrective

actions are taken as necessary to address any deficiencies or non-compliance issues.

ARTICLE 10. POLICY REVIEW AND UPDATE Regular Review

Annual Review: The Record Keeping Policy is subject to an annual review to ensure its continued relevance and effectiveness. This review considers changes in the business environment, operational needs, and legal requirements.

Involvement of Stakeholders: The review process involves key stakeholders, including legal advisors, compliance officers, and department heads, to provide a comprehensive perspective.

Amendments

Policy Updates: Any amendments to the policy, resulting from the review process or changes in external conditions, are promptly made to ensure the policy remains current and effective.

Communication of Changes: Amendments to the policy are communicated to all relevant parties, including employees, contractors, and other stakeholders, through appropriate channels such as internal memos, training sessions, or digital platforms.

Documentation of Changes: All changes are documented, including the rationale behind the amendments, to maintain a clear historical record of the policy's evolution.

ARTICLE 11. DIGITAL RECORD KEEPING Electronic Management Systems

Adoption of ERMS: Credit Glorious Property Holdings Ltd. adopts advanced Electronic Record Management Systems (ERMS) for efficient storage, management, and retrieval of digital records. This includes the use of secure cloud storage solutions, ensuring data redundancy, and robust disaster recovery capabilities.

System Integration: Integration of ERMS with other business systems for seamless data flow and consistency across various platforms.

Security and Accessibility: Implementing strong security protocols within ERMS to protect against unauthorized access while ensuring easy accessibility for authorized personnel.

Digital Transformation

Digitization of Paper Records: A systematic approach to convert paper records into electronic formats, thereby ensuring their long-term preservation and enhanced accessibility.

Quality Assurance: Establishing procedures to maintain the integrity and quality of records during the digitization process.

Archive Management: Developing a structured archive system for digitized records, facilitating efficient retrieval and management.

ARTICLE 12. DATA PRIVACY AND PROTECTION Data Protection Measures

Implementation of Security Protocols

Encryption: All sensitive and personal digital records will be encrypted to protect against unauthorized access and data breaches.

Anonymization: Where applicable, personal data will be anonymized to further enhance privacy and comply with data protection regulations.

Secure Data Transfer Protocols: The company will employ secure data transfer protocols to ensure the safe transmission of sensitive information across networks.

Compliance with GDPR and UK Data Protection Laws

Adherence to Regulations: All digital record-keeping practices will strictly adhere to the requirements of the



General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

Data Protection Principles: The company commits to upholding the principles of data protection and privacy as outlined in these regulations. This includes ensuring lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality of personal data.

Rights of Data Subjects: The company will respect and facilitate the rights of data subjects, including the right to access, rectify, erase, restrict processing, data portability, object, and rights in relation to automated decision-making and profiling.

Privacy Impact Assessments

Conducting Assessments: The Company will regularly conduct privacy impact assessments for all recordkeeping processes, particularly those involving personal data, to identify potential privacy risks.

Mitigation Strategies: Credit Glorious will develop and implement strategies to mitigate identified privacy risks in record-keeping processes.

Documentation and Review: The Company will maintain detailed documentation of privacy impact assessments and will review them periodically to ensure ongoing protection of privacy rights.

ARTICLE 13. RECORD ACCESSIBILITY AND RETRIEVAL Efficient Retrieval Systems

System Implementation: Credit Glorious Property Holdings Ltd. commits to implementing and maintaining efficient systems for the retrieval of records. These systems are designed to ensure that records can be accessed promptly and accurately, supporting the company's operational efficiency.

Operational Response: The company ensures that these retrieval systems facilitate quick access to records, particularly in response to operational needs, audits, or legal requests. This capability is crucial for maintaining business continuity and compliance with regulatory requirements.

User-Friendly Interface: The retrieval systems are designed with user-friendly interfaces. This design principle enables easy navigation and location of records by authorized personnel, reducing the time and effort required to access necessary information.

Accessibility Compliance

Adherence to Standards: The company is committed to ensuring compliance with legal standards for accessibility. This commitment is particularly focused on accommodating individuals with disabilities, in line with applicable laws and regulations.

Training and Resources: Credit Glorious Property Holdings Ltd. provides training and resources to its staff to ensure they are fully aware of and capable of facilitating the accessibility requirements. This training includes instructions on how to use retrieval systems effectively and how to assist individuals requiring additional support.

Regular Review: The company periodically reviews the accessibility features of its record-keeping systems. This regular review process ensures ongoing compliance

with accessibility standards and addresses any emerging needs or changes in legal requirements. The goal is to maintain an inclusive environment where all authorized individuals can access records as needed.

ARTICLE 14. AUDIT AND COMPLIANCE Internal and External Audits

Regular Auditing: Credit Glorious Property Holdings Ltd. is committed to conducting both internal and external audits regularly. These audits are crucial for evaluating the effectiveness and efficiency of the company's recordkeeping practices.

Policy Adherence: Each audit assesses compliance with this Record Keeping Policy. The focus is on identifying areas where the company can improve its record management practices, ensuring alignment with best practices and regulatory requirements.

Audit Documentation: The findings from each audit are meticulously documented. The company is committed to implementing recommended changes arising from these audits to continually enhance its record-keeping practices.

Compliance Reporting

Reporting Systems: The company has established a robust system for regular compliance reporting. This system is designed to document adherence to both internal policies and external regulatory requirements, ensuring a comprehensive overview of compliance status.

Internal Governance Reporting: Compliance status and any issues identified are reported to internal governance bodies. This process ensures transparency and accountability within the company, fostering a culture of compliance and ethical business practices.

Regulatory Reporting: Where applicable, the company also reports its compliance status to external regulatory agencies. This commitment to open communication is part of the company's adherence to legal obligations and its dedication to maintaining high standards of corporate governance.

Audit and Compliance

Internal and External Audits

Regular Audits: Credit Glorious Property Holdings Ltd. commits to conducting both internal and external audits regularly. These audits are essential for evaluating the effectiveness of our record-keeping practices and ensuring compliance with this policy, as well as with FCA regulations and other applicable laws.

Audit Scope: The audits will cover all aspects of record keeping, including accuracy, accessibility, retention, and disposal of records.

Compliance Reporting

Reporting System: We will establish a system for regular compliance reporting. This system will report to internal governance bodies and, where applicable, to external regulatory agencies, including the FCA.

Transparency and Accountability: These reports will ensure transparency in our record-keeping practices and



hold us accountable to both internal standards and external regulatory requirements.

ARTICLE 15. INCIDENT MANAGEMENT 15.1 Breach Notification Procedures Procedure Development

Identification and Assessment:

Immediate Identification: All employees are trained to identify potential record-keeping breaches, including data breaches.

Initial Assessment: Once a potential breach is identified, an immediate assessment is conducted to determine the scope and impact.

Notification Protocol:

Internal Reporting: The incident must be reported internally to the designated Data Protection Officer (DPO) or relevant authority within the company without undue delay.

External Notification: If the breach poses a risk to the rights and freedoms of individuals, it must be reported to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it, as per GDPR requirements.

Containment and Recovery:

Immediate Action: Steps are taken to contain the breach and prevent further unauthorized access or loss of data. *Recovery Plans*: Implement recovery plans to restore any lost data and secure our systems against future breaches.

Risk Assessment:

Evaluate Impact: Assess the potential impact on affected individuals and the company.

Document Findings: All findings from the risk assessment are documented for future reference and action.

Communication with Affected Parties:

Informing Affected Individuals: If the breach is likely to result in a high risk to the rights and freedoms of individuals, they will be informed without undue delay. *Clear and Concise Information*: Communication will be in clear and plain language, explaining the nature of the breach, the likely consequences, and the measures being taken.

Regulatory Compliance:

Documentation: All breaches and the company's response are documented to demonstrate compliance with the UK Data Protection Act, GDPR, and other relevant regulations.

Legal Obligations: Ensure all legal obligations are met in the event of a breach, including any sector-specific regulations.

Incident Logs

Logging Incidents:

Comprehensive Records: Maintain detailed logs of all record-keeping incidents, including the nature of the

breach, affected data, and the number of individuals impacted.

Action Taken: Document the response actions taken, including any notifications made and measures implemented to prevent future breaches.

Review and Analysis:

Regular Review: Incident logs are reviewed regularly to identify patterns or recurring issues.

Improvement Measures: Based on the analysis, implement measures to strengthen record-keeping and data protection practices.

Training and Awareness:

Employee Training: Regular training sessions are conducted for employees on incident management and breach notification procedures.

Awareness Programs: Develop awareness programs to keep data protection and breach response at the forefront of company culture.

ARTICLE 16: POLICY ENFORCEMENT Consequences of Non-Compliance

Enforcement Measures

Graduated Disciplinary Actions:

- *Initial Stage*: For minor or first-time violations, employees may receive a formal warning and be required to undergo additional training.
- Progressive Discipline: Repeated or serious violations will result in more severe disciplinary actions, which could include suspension or demotion.
- Termination of Employment: In cases of gross misconduct or persistent non-compliance, termination of employment may be considered.

Performance Reviews:

- Record-Keeping Compliance: Compliance with the record-keeping policy is a factor in employee performance reviews and evaluations.
- Impact on Career Progression: Non-compliance may impact opportunities for promotions, bonuses, or other career advancements.

Documentation of Violations:

- *Record of Incidents*: All incidents of noncompliance are documented in the employee's personnel file.
- Transparency in Documentation: Employees are informed about the documentation and given an opportunity to respond or appeal.

Legal Compliance Regulatory Implications:

Legal Consequences: Non-compliance may lead to legal implications, especially if it results in a breach of regulatory requirements like the UK Data Protection Act or GDPR.



Company Liability: The company may face fines, penalties, or legal actions due to non-compliance by its employees.

Employee Liability:

Personal Accountability: Employees may be held personally accountable for actions that lead to legal breaches, including potential personal fines or legal consequences.

Legal Support: The company may provide legal support to employees in certain circumstances, but this is not guaranteed, especially in cases of willful misconduct or gross negligence.

Training and Awareness:

- *Regular Training:* Employees receive regular training on the importance of compliance with the record-keeping policy and the potential legal implications of non-compliance.
- Awareness Campaigns: Ongoing awareness campaigns reinforce the importance of adhering to policy and the potential consequences of non-compliance.

Communication Plan – Communication Channels, frequency, and content

- Internal Platforms: The Company will utilize internal communication platforms, including email, intranet, and company meetings, to disseminate updates related to the recordkeeping policy.
- Dedicated Portal: A dedicated section on the company intranet will be established to provide easy access to updates and resources related to record-keeping.
- Regular Updates: The Company will schedule regular updates to ensure stakeholders are kept informed about any changes in the recordkeeping policy.
- Ad-Hoc Announcements: Immediate communication will be provided for urgent policy updates or significant changes.
- *Policy Changes*: Any changes in the policy, including the reasons for these changes and their implications, will be clearly outlined.
- Training Opportunities: Upcoming training sessions will be announced, and participation will be encouraged to ensure compliance and understanding of the policy.
- *Feedback Channels*: Channels will be established for stakeholders to provide feedback or ask questions about the policy.
- *Response Protocol:* A protocol will be implemented for responding to feedback or inquiries in a timely and effective manner.

Regular Communication for Compliance and Engagement

- *Targeted Messaging*: Messages will be tailored to different groups within the organization based on their roles and responsibilities.
- Consistent Messaging: Core messages about the importance of record-keeping compliance will be consistent across all communications.
- Interactive Sessions: The Company will host Q&A sessions, workshops, or webinars to engage employees and stakeholders in discussions about record-keeping practices.
- Best Practices Sharing: Best practices and success stories will be shared to illustrate the effective implementation of the record-keeping policy.
- Easy Access to Information: All employees will have easy access to the record-keeping policy and related resources.
- Language and Clarity: Communications will use clear, jargon-free language to ensure they are understandable to all employees.
- Effectiveness of Communication: The effectiveness of communication strategies in promoting policy awareness and compliance will be regularly assessed.
- Adjustments and Improvements: Necessary adjustments to the communication plan will be made based on feedback and evaluation outcomes.

ARTICLE 17. STAKEHOLDER ENGAGEMENT Involving Stakeholders

Stakeholder Participation: Key stakeholders will be involved in the development and periodic review of the record-keeping policy. This ensures that the policy meets the diverse needs of our organization and complies with regulatory standards.

Diverse Perspectives: Stakeholder involvement will bring diverse perspectives and expertise to our record-keeping practices.

CONCLUSIONS OF THE RECORD KEEPING POLICY

As we conclude this Record Keeping Policy, Credit Glorious Property Holdings Ltd. reaffirms its commitment to maintaining the highest standards of record management. This policy is not merely a compliance requirement; it is a cornerstone of our operational integrity, transparency, and accountability.

The following points encapsulate the essence of our policy:

 Upholding Standards: Our policy is designed to ensure that all record-keeping practices align with the UK Data Protection Act, GDPR, and other relevant legal and regulatory frameworks.



Adherence to these standards safeguards the company against legal risks and reinforces our reputation for reliability and trustworthiness.

- 2. Comprehensive Scope: This policy covers all aspects of record management, from creation and classification to retention, storage, disposal, and beyond. It applies to all employees, contractors, and agents of the company, ensuring a unified and consistent approach across the organization.
- 3. Dynamic Adaptability: Recognizing the everevolving nature of business, legal, and technological landscapes, our policy is not static. It is subject to regular reviews and updates, ensuring that our practices remain current and effective in the face of changing requirements and challenges.
- 4. Employee Involvement and Training: We emphasize the importance of employee engagement and education in effective record management. Regular training and clear communication channels are established to ensure that every member of our team understands their role and responsibilities in upholding this policy.
- 5. Audit and Compliance: Through regular internal and external audits, we maintain a vigilant stance on compliance, promptly addressing any areas of concern and continuously enhancing our record-keeping practices.
- 6. Incident Management and Enforcement: We have clear procedures for managing and reporting record-keeping incidents, including data breaches. The policy outlines the consequences of non-compliance, underscoring our commitment to maintaining rigorous standards.
- 7. Stakeholder Engagement: Our policy recognizes the importance of involving various stakeholders in its development and periodic review. This inclusive approach ensures that our policy meets diverse needs and benefits from a wide range of insights and expertise; and
- 8. Transparency and Communication: The policy is underpinned by a robust communication plan, ensuring that all updates, training opportunities, and best practices in record keeping are effectively communicated to stakeholders.

In conclusion, the Record Keeping Policy of Credit Glorious Property Holdings Ltd. is a testament to our dedication to excellence in corporate governance. It is a vital tool that supports our mission to conduct business with the utmost integrity, ensuring that our records are accurate, secure, and managed in a way that upholds our values and meets our legal and regulatory obligations.