

Dated May 2018

DATA RETENTION POLICY

Data Retention Policy

1. Overview

- 1.1 The purpose of this policy is to provide a framework which will govern decisions over whether particular data or documents should be retained or disposed of. Furthermore, where documents are retained it provides a framework for the appropriate retention period and format.
- 1.2 Personal data is important throughout the different areas of our organisation. It is used by us amongst other things, to meet our strategic objectives, comply with our legal obligations and meet our contractual obligations towards our employees, clients and others.
- 1.3 As such, all personal data should be safeguarded and held securely in accordance with our IT and Communications Policy.
- 1.4 Personal information shall be kept accurate and retained for no longer than is necessary to meet the purpose for which it is held.
- 1.5 Personal data is stored in a number of ways including through our personnel system, marketing lists and client databases. It is kept in electronic and/or hard copy form.
- 1.6 Employees should be aware that whenever they access our systems, they may be accessing personal data and should therefore comply with our IT and Communications Policy at all times.

2. Retention Principles

- 2.1 Personal data will only be kept for as long as necessary or until there is no longer a good reason to do so.
- 2.2 The attached Document Retention Schedule details the length of time particular personal data will be retained for and at what points it will be destroyed.

3. Security Arrangements

- 3.1 Please see our Data Protection Policy for details of the security arrangements in place.

4. Individual Rights

- 4.1 Should an individual ask for their personal information to be removed or corrected, requests will be dealt with promptly and in accordance with data protection laws.

4.2 All individuals will be informed, via a privacy notice, of the retention period of their data and/or the criteria used to determine that period.

4.3 Should the purpose of processing the data change and a new retention period apply, a revised privacy notice will be sent to individuals.

5. What will happen to your information

5.1 When the retention period for your personal information reaches an end then we will take the following actions:

- Paper records will be securely shredded.
- Electronic records will be deleted.

Data Retention Schedule

Data Type	Data Retention Period	Review Period
Employee Data	Data will be retained for so long as it is necessary to manage, administer and perform the employment relationship and then in line with retention of data for former employees.	Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.
Former Employee Data	As a general rule data will be retained for 7 years from termination of employment. We are required by law to keep certain statutory records (for example relating to health and safety issues) for longer periods.	Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.
Client Contact Data	For a rolling 2 year period following on from our latest contact with the client contact.	Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.
Other Business Contact Data	For a rolling 2 year period following on from our latest contact with our contact.	Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.

<p>Job Applicant Data</p>	<p>As a general rule we will keep job applicant data for so long as it is necessary to manage, administer and perform the applicable recruitment process.</p> <p>Where an applicant does not become an employee we will normally keep their data for a period of [6] months.</p>	<p>Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.</p>
<p>CCTV Data</p>	<p>As a general rule we will keep CCTV data for a period of 21 days unless there is a good reason to apply a different criteria (e.g. an ongoing investigation or other legal requirement that necessitates the retention of the data).</p>	<p>Personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.</p>