

GDPR - DATA RETENTION POLICY WITH SCHEDULE

This is the Data Retention Policy of Elementa Support Services Ltd.

Introduction

We recognise that in the running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is held in both hard copy and electronic form.

Aims of the policy

Our business will ensure that personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfill our statutory obligations and the provision of goods or/and services - as required by the data protection legislation, including the General Data Protection Regulation (GDPR).

Retention

This retention policy (with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

Decisions around retention and disposal should be taken in accordance with this policy.

Where a retention period of a specific document has expired, a review should always be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration should be given to the method of disposal.

Responsibility

Steve Ryan is responsible to keep this retention schedule up to date, to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business.

Steve Ryan is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

Steve Ryan should inform Sarah Morrison if in any doubt about minimum retention periods or if the retention of a document is necessary for a potential claim.

Disposal

We must ensure that personal data is securely disposed of when it's no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The method of disposal should be appropriate to the nature and sensitivity of the documents concerned and includes:

- Non-Confidential records: place in wastepaper bin for disposal
- Confidential records: shred documents and dispose
- Deletion of Computer Records: deleted and permanently deleted
- Transmission of records to an external body: done via secure transfer mediums

- Cloud storage: data secured in line with our CRM Privacy Policy (available at <https://www.neetrix.com/privacy.html>)
- CRM: data secured in line with CRM Privacy Policy (available at <https://www.neetrix.com/privacy.html>)

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Exceptional circumstances should be reported to Sarah Morrison without delay.

Date created: September 2018

Reviewed: September 2019, September 2020

Date of review: September 2021

Appendix 1: Document retention schedule

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|---|---|------------------------|--------|---|
| Employment records: | | | | |
| PAYE records | [3] years from end of fiscal year after employment ceases | Payroll Software & CRM | Legal | Software auto-deletes 3 years from leave date |
| Maternity and paternity pay records | [3] years from end of fiscal year | Payroll Software | Legal | Data permanently deleted from system |
| Unsuccessful candidates | [6 months] after last action | CRM | GDPR | Data permanently deleted from system |
| Accident report forms | [3] years after last action | HR Files | Legal | Data destroyed |
| Parental leave records | [3] years from birth of child | Payroll Software | Legal | Data permanently deleted from system |
| Employment records: redundancy, equal opportunities; health & welfare records | [6] years after last action | Server | Legal | Data permanently deleted from system |
| Employees that left the business: emergency contacts and bank account details | Deleted immediately after making final salary payment | Payroll Software | Legal | Software auto-clears on leave date |
| Pay & tax: pay deductions, tax forms, payroll, loans | [6] years after last action | Server | Legal | Data permanently deleted from system |
| Records of formal disciplinary actions in employee file | [6] years after last action | HR Files | Legal | Data destroyed |

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|---|--------------------------------------|-------------------|--------------------|---|
| Records of formal grievances in employee file | [6] years after last action | HR Files | Legal | Data destroyed |
| Commercial contracts: | | | | |
| Contracts with suppliers | [6] years after last action | CRM | Audit | Data permanently deleted from system |
| Contracts signed as a deed | [12] years after last action | CRM | Legal | Data permanently deleted from system |
| Guarantees and indemnities | Term of the guarantee plus [6] years | Server | Legal | Data permanently deleted from system |
| Purchase orders and invoices | Duration of business existence | Accounting System | Legal & Audit | Data stored to support accounting records |
| Tax and Accounting Records: | | | | |
| Tax returns | [10] years from end of fiscal year | Accounting System | Legal & Audit | Data permanently deleted from system |
| Accounting & financial management information | Duration of business existence | Accounting System | Legal & Audit | Data permanently deleted from system |
| Stock transfer forms and share certificates | [20] years from purchase | Server | Legal & Audit | Data stored to support legal ownership structures |
| Marketing records: | | | | |
| Mailing lists | [1] year after last action | CRM | GDPR | Data permanently deleted from system |
| Operational records: | | | | |
| Fire Risk Assessments | Retain until superseded | Server | Legal | Document maintained until superseded – prev. document is stored for audit purposes. |
| Policies/Procedures | [7] years | Server | Internal Processes | Document maintained until superseded – prev. |

