

## **GDPR - DATA RETENTION POLICY WITH SCHEDULE**

### **This is the Data Retention Policy of Tansleys Printers 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**

Josh Tansley 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.

Josh Tansley is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents. Josh Tansley may delegate the operational aspect of this function to Gillian Tansley.

Gillian Tansley should inform Josh Tansley 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 This will reduce the risk that it will become inaccurate, out of date or irrelevant.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 waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records

- Transmission of records to an external body
- Cloud storage
- Confidential Waste shredding with Envirosure

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 Josh Tansley without delay.

Date created: 10<sup>th</sup> May 2018

Date of review: 10<sup>th</sup> November 2018

### Appendix 1: Document retention schedule

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
<b>Employment records:</b>				
PAYE records	3 years from end of fiscal year	Office Computer and file in locked cabinet in Office	Legal	Delete on Computer and Confidential Shredding
Maternity and paternity pay records	3 years from end of fiscal year	Office Computer and Locked filing cabinet in office.	Legal	Delete on Computer and Confidential Shredding
Medical and health records	30 years after employment ceases	Keep in wages file till year end and then file with old insurance Documents	Legal	Confidential shredding
Unsuccessful candidates	6 months after last action	Filing cabinet locked in office and emails	Legal	Shred and delete email trail
Accident report forms	3 years after last action	Paper copies in locked filing cabinet	Legal and Insurance	Confidential shredding
Parental leave records	5 years from birth of child	Wages file and Sage payroll	Legal	Delete on computer and Confidential Shredding
Employment records: redundancy, equal opportunities; health & welfare records	6 years after last action	Sage payroll and wages file	Legal	Delete on Computer and Confidentially shred paper

Employees that left the business: emergency contacts and bank account details	Delete immediately after making final salary payment]		Legal	Delete on Computer
Pay & tax: pay deductions, tax forms, payroll, loans	6 years after last action	Wages file and Sage payroll on Office computer	Legal	Delete on Computer and Confidentially shred paper
Records of formal disciplinary actions in employee file	6 years after last action	Wages file and Sage payroll	Legal	Delete on Computer and Confidentially Shred paper
Records of formal grievances in employee file	6 years after last action	Legal	Employment contract	Delete on Computer and Confidential shredding
<b>Commercial contracts:</b>				
Contracts with suppliers	6 years after last action	Filing Cabinet	Supply contract	Confidential Shredding
Contracts signed as a deed	12 years after last action	n/a	n/a	n/a
Guarantees and indemnities	The term of the guarantee plus 6 years	n/a	n/a	n/a
Purchase orders and invoices	7 years after last action	Filing cabinet	Legal VAT	Confidential shredding
<b>Tax and Accounting Records:</b>				
Tax returns	10 years from end of fiscal year	Accountant	Audit	Delete on Computer
Accounting & financial management information	6 years from end of fiscal year	Office computer and hard copy files	Legal	Delete on computer and Confidential shredding
<b>Marketing records:</b>	n/a	n/a	n/a	n/a
Mailing lists	1 year after last action	Dans computer	To assist with audit	Delete on Computer
<b>Operational records:</b>				
Vehicles	Keep asset and depreciation records for 6 years after end of financial year to which they relate	Filing Cabinet	Filing cabinet	Confidential shredding
Closed circuit television recordings	Destroy 4 weeks from the date recorded except where required as evidence	Dan's Computer	Legal	Delete from computer
Fire Risk Assessments	Retain until superseded	Safety file	Insurance	Confidential shredding

Policies/Procedures	7 years	GDPR file	Legal	Confidential shredding
Complaints	n/a	Not stored, resolved immediately	n/a	n/a
Building lease/deeds) (i.e.)	Destroy 6 years after property is no longer occupied	Solicitor has copy and we have one	Legal	Confidential shredding
Maintenance contracts	15 years from last action	Locked Filing Cabinet	Legal	Confidential shredding
Website FAQs	6 months from last action	n/a	n/a	n/a
Property plans and surveys	n/a	n/a	n/a	n/a
Insurance schedules	10 years after last action	Filed in Office also on office computer	Legal	Confidential shredding, delete on computer
Pat tests, fire hazard tests	6 years from last action	Filed in office	Legal	Confidential shredding
Register of members	Life of company	n/a	n/a	n/a
Memorandum of association	Life of company	Accountant	Legal	Destroy when no longer needed
Register of directors and secretaries	Life of company	Accountant and copies in filing cabinet	Legal	Destroy when no longer needed
Employer's liability insurance certificates	Life of company	Computer in office and hard copies in locked filing cabinets	Legal	Confidential Shredding and Delete off computers
<b>Intellectual property records:</b>				
Copyright material	50 years from expiry	n/a	n/a	n/a
<b>Email records:</b>				
Email correspondence	Archive emails after 6 months	Dans Computer or Office computer	To Keep for a record in case we have to refer back	Deleted regularly

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