

DATA RETENTION POLICY

The Company has a responsibility to look after the information which we collect about individuals, whether our customers, employees, or people browsing our websites. The GDPR Policy and Employee Privacy Notice set out the general principles that apply when we collect and use personal information. The Company will only keep personal information for as long as it needs to. If we don't need the personal information anymore, we must delete it or anonymise it. This Data Retention Policy sets out a process for the retention and disposal of personal information to help us comply with the retention principle. In practice this means ensuring we only keep personal information for as long as it is needed for the purpose for which it was collected (or for a further permitted purpose) and also:

- retain potential evidence that may be required in the course of litigation;
- securely destroy outdated records;
- optimise the use of space; and
- minimise the cost of record retention.

This Policy will (a) assist you in understanding the different categories of personal information retained by the Company and (b) explain the retention guidelines for different categories of personal information.

All employees who have responsibility for the categories of personal information covered in this Policy should ensure that the personal information is deleted within the time periods specified below. The only exceptions are where one of the 'Exceptions to this Policy' applies or if the Company instructs you to observe a different retention period because of a conflicting legal obligation to which the Company is subject.

Any employee who fails to comply with this Policy may be subject to disciplinary action, up to and including dismissal. You should immediately contact [a Director / HR] if you become aware of a breach or potential breach of this Policy.

EXCEPTIONS TO THIS POLICY

Litigation

The Company may be legally required to retain personal information for longer periods where the personal information relates to anticipated or current litigation or other legal proceedings. Often referred to as a 'Litigation Hold', this is a legal obligation which overrides any retention period which would otherwise apply to the personal information.

If you are aware of any anticipated or current litigation relating to the personal information, or in the event of a 'Litigation Hold', you should immediately suspend deletion of the personal information. Failure to comply with a Litigation Hold could expose the Company to serious legal consequences. Files and documents relating to current or pending litigation should be kept until any dispute is fully resolved and is not open to an appeal.

Statistical Analysis of Personal Information

Personal information may be stored for longer periods where it will only be processed for statistical or research purposes and where appropriate technical and organisational safeguards are in place, for example, where the personal information is pseudonymised, and where the processing is not used to reach a decision affecting a particular individual. Where statistical analysis is applied to the personal information and appropriate safeguards such as pseudonymisation are in place then the retention periods stated below will not apply to that personal information and it may be kept for a longer period where there is an ongoing need to do so. Retention would still, however, be subject to important considerations for the Company such as retaining up-to-date records, optimising the use of space and minimising the cost of data retention.

Personal information which is anonymised is not subject to the Company's Data Protection & Privacy Policy and therefore the retention periods in this Data Retention Policy will not apply to it.

RETENTION OF PERSONAL INFORMATION

Under data protection law, the Company is prohibited from retaining personal information for longer than is necessary for the purpose or purposes for which it was obtained.

Retention periods for categories of personal information

Category of Data	Retention Period
Job applications, CVs and interview notes of successful job candidates	Duration of employment plus 7 years
Job applications, CVs and interview notes of unsuccessful job candidates	7 months (unless permission obtained to keep their CV 'on file')
Personnel file (paper and electronic)	Duration of employment plus 7 years
Records relating to sick leave and absence	Retain on Personnel File
Criminal background checks	Retain on Personnel File if they relate to a successful candidate. If the checks relate to an unsuccessful candidate then the retention period is 18 months
Disciplinary Notes	Retain on Personnel File or remove after fixed period of time communicated to the individual (e.g. written warning)
Pension Information	Pensions files are, usually, held by or on behalf of the Trustees of the relevant pension schemes (who are the data controller in respect of information contained in Pensions Files). Some pension related information may be included in the Personnel file.