

## **Retention Policy**

### **1. About this policy**

- 1.1. The policy sets out how we retain personal data collected from current, former and prospective customers, as well as our current, former and prospective employees, workers and contractors in accordance with our data protection obligations under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).
- 1.2. This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.
- 1.3. Personal data, or personal information, means any information about an individual from which that person can be identified. This includes "special categories" of more sensitive personal data. It does not include data where the identity has been removed (anonymous data).

### **2. Responsibility for the policy**

- 2.1. Matt Barnes is responsible for implementing and monitoring compliance with this policy.
- 2.2. All employees, workers and contractors who process personal information in the course of business at the company should ensure that they implement and abide by the policy.
- 2.3. An annual review of this policy will be undertaken to verify that it is in effective operation.

### **3. Data storage**

- 3.1. This policy applies to personal information (in any format) relating to current, former and prospective employees, workers and contractors that is stored by the company, including data stored on:

- a) the company's own servers;
- b) third party servers;
- c) email accounts;
- d) desktops;
- e) employee-owned devices;
- f) backup storage;
- g) paper files; or
- h) tachograph downloads.

- 3.2. Retention periods:

Personal data should only be retained for as long as necessary. Retention periods for data will differ depending on:

- a) the requirements of the company;

- b) the type of personal data;
- c) the purpose of processing;
- d) the lawful grounds for processing; and
- e) the categories of data subjects.

3.3. Personal information will usually be retained for at least the period specified in our data retention guidelines below. These retention periods may be extended in circumstances where this is required. In particular:

- a) Recommended retention periods should be extended for any documents that may be required in connection with any pending civil or criminal litigation, any litigation or regulatory proceeding. These records must not be destroyed until after any possible appeals or associated actions have been ruled out.
- b) Documents that are the subject of pending or ongoing subject access requests are required to be retained until otherwise directed by Matt Barnes.

3.4. We will ensure periodic reviews of any data that is retained. If you hold, or are aware of, any personal information that is not stored on the company's global networks, you should ensure that these are considered and deleted where necessary.

<b>Type of customer record</b>	<b>Format and location</b>	<b>Retention period or recommendation</b>
Customer records (including name, title, date of birth, gender)	<b><i>Paper and electronic</i></b>	<b>Six years after the end of each tax year.</b>
Contact details (address, email address and telephone numbers)	<b><i>Paper and electronic</i></b>	<b>Six years after the end of each tax year.</b>
Booking information	<b><i>Paper and electronic</i></b>	<b>Six years after the end of each tax year.</b>
Payment and financial details	<b><i>Paper and electronic</i></b>	<b>Six years after the end of each tax year.</b>
Record of webchat messages	<b><i>Electronic</i></b>	<b>Six months.</b>

<b>Type of employment record</b>	<b>Format and location</b>	<b>Retention period or recommendation</b>
<b>Personnel records</b>		
Job applications and interview records of unsuccessful candidates (including contact details, CVs, application forms, references, interview notes and test results)	Paper or electronic	Six months after applicant is notified of rejection.
Criminal records information (including criminal records requirement assessments for a particular post, criminal records information forms, the Disclosure and Barring Service (DBS) check forms, DBS certificates)	Paper or electronic	<p>DBS checks kept throughout your employment and up to two years after leaving.</p> <p>Criminal records requirement assessments for a particular post—12 months after the assessment was last used</p> <p>All other information in this category—as soon as practicable after the check has been completed and the outcome recorded (whether satisfactory or not) unless, in exceptional circumstances, a director assesses that it is clearly relevant to the ongoing employment relationship in which case, six months.</p>
Written particulars of employment, contracts of employment, and changes to terms and conditions	Paper or electronic	Six years after employment ceases, unless document executed as a deed, in which case 12 years after employment ceases.
Personnel and training records	Paper or electronic	Six year after employment ceases.

Directors' service contracts and any variations	Paper or electronic	Six years from termination or expiry of the contract, unless executed as a deed, in which case 12 years from termination or expiry.
Copies of identification documents (eg passports)	Paper or electronic	Not less than two years from date of termination of employment.
Identification documents of foreign nationals (including right to work)	Paper or electronic	Not less than two years from date of termination of employment.
Records concerning a temporary worker	Paper or electronic	Six year after employment ceases.
Employee performance and conduct records (including probationary period reviews, review meeting and assessment interviews, appraisals and evaluations, promotions and demotions)	Paper or electronic	Six year after employment ceases.
Working time opt-out forms	Paper or electronic, originals are not required by the <i>WTR 1998</i>	Two years from the date on which they were entered into.
Records to show compliance with the <i>Working Time Regulations 1998</i>	Paper or electronic	Two years from the date on which the record was made.
Redundancy records	Paper or electronic	Six years from date of redundancy.
Annual leave records	Paper or electronic	Six years or possibly longer if leave can be carried over from year to year.

Parental leave records	Paper or electronic	Six years after the end of each tax year.
Sickness records	Paper or electronic	Six years after the end of each tax year.
Records of return to work meetings following sickness, maternity etc.	Paper or electronic	Six years after the end of each tax year.
Consents for the processing of personal and sensitive data	Paper or electronic	For as long as the data is being processed and up to 6 years afterwards.
Collective workforce agreements and past agreements that could affect present employees	Paper or electronic	Permanently.

### ***Payroll and salary records***

Payroll and wage records for companies	Paper or electronic	Six years from the financial year-end in which payments were made.
<i>PAYE</i> records	Paper or electronic	Not less than three years after the end of the tax year to which they relate. However it may be sensible to keep them for six years as they may fall within the definition of payroll and wage records (see above).
Income tax and NI returns, income tax records and correspondence with HMRC	Paper or electronic	Three years after the end of the financial year to which they relate.

Records demonstrating compliance with national minimum wage requirements	Paper or electronic	Three years beginning with the day upon which the pay reference period immediately following that to which they relate ends.
Details of benefits in kind, income tax records (P45, P60, P58, P48 etc), annual return of taxable pay and tax paid	Paper or electronic	Six years.
Employee income tax and national insurance returns and associated HMRC correspondence	Paper or electronic	Three years from end of tax year to which they relate.
Statutory sick pay (SSP) records	Paper or electronic	Three years after the end of the tax year to which they relate.
Records relating to hours worked and payments made to workers	Paper or electronic	Three years.
Statutory maternity, paternity and shared parental pay records, calculations, certificates or other evidence	Paper or electronic	Three years after the end of the tax year in which the period of statutory pay ends.
Death Benefit Nomination and Revocation Forms	Paper or electronic	While employment continues or up to six years after payment of benefit.
<b><i>Health and safety records</i></b>		
Records of reportable injuries, diseases or dangerous occurrences.	Paper or electronic	Three years from date of the entry

#### 4. Deletion of data

4.1. Personal information should be deleted at the end of the retention period unless we are reasonably required to keep the data for a longer period.

4.2. In the event a request for erasure is received in respect of personal data, the company will erase the data. However, this may not be the case where personal information has been or is being processed for the following reasons:

- a) to exercise the right of freedom of expression and information;
- b) to comply with a legal obligation for the performance of a public interest task or exercise of official authority;
- c) for a complaint or other internal or external investigation;
- d) for public health purposes in the public interest;
- e) for archiving purposes in the public interest, scientific research historical research or statistical purposes; or
- f) for the exercise or defence of legal claims.