



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

### **This is the Data Retention Policy of ermc Limited**

#### **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**

The Managing Director 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.

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

The Managing Director may delegate the operational aspect of this function to the Office Manager.

The Managing Director should inform the Office Manager 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 This will reduce the risk that it will become inaccurate, out of date or irrelevant.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

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 the Office Manager without delay.

Date created: 22 May 2018

Date for review: May 2019

## 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	Electronically on M drive	Legal	Deletion of computer records
Maternity and paternity pay records	3 years from end of fiscal year	Electronically on M drive and hard copies in locked Accounting cabinet	Legal	Deletion of computer records. Hard copies confidentially shredded
Medical and health records	30 years after employment ceases	Electronically on M drive	Consent	Deletion of computer records
Unsuccessful candidates	6 months after last action	Electronically on M drive	Legal	Deletion of computer records
Accident report forms	3 years after last action	Electronically on O drive	Legal	Deletion of computer records
Parental leave records	5 years from birth of child	Electronically on M drive and hard copies in locked Accounting cabinet	Contract	Deletion of computer records. Hard copies confidentially shredded
Employment records: redundancy, equal opportunities; health & welfare records	6 years after last action	Electronically on M drive	Contract	Deletion of computer records
Employees that left the business: emergency contacts and bank account details	Deleted immediately after making final salary payment			
Pay & tax: pay deductions, tax forms, payroll, loans	6 years after last action	Electronically on M drive	Legal	Deletion of computer records
Records of formal disciplinary actions in employee file	6 years after last action	Electronically on M drive	Contract	Deletion of computer records
Records of formal grievances in employee file	6 years after last action	Electronically on M drive	Contract	Deletion of computer records
<b>Commercial contracts:</b>				
Contracts with suppliers	6 years after last action	Electronically on relevant company drive	Legal	Deletion of computer records

Contracts signed as a deed	12 years after last action	Electronically on relevant company drive	Legal	Deletion of computer records
Guarantees and indemnities	6 or 12 years after last action depending on signatory protocol	Electronically on relevant company drive	Legal	Deletion of computer records
Purchase orders and invoices	7 years after last action	Electronically on relevant company drive and in Praesto	Legal	Deletion of computer records
<b>Tax and Accounting Records:</b>				
Tax returns	10 years from end of fiscal year	Electronically on M drive and hard copies in locked Accounting cabinet	Legal	Deletion of computer records. Hard copies confidentially shredded
Accounting & financial management information	6 years from end of fiscal year	Electronically on relevant company drive, Quickbooks, Praesto and hard copies in locked Accounting cabinet	Legal	Deletion of computer records. Hard copies confidentially shredded
Stock transfer forms and share certificates	20 years from purchase	Held with accountants at registered office	Legal	Deletion of computer records
Information relating to non-payers	Until the debt has been settled	Electronically on M drive, Quickbooks and Praesto	Contract	Deletion of computer records
<b>Marketing records:</b>				
Mailing lists	1 year after last action	Electronically on M drive	Legitimate interests	Deletion of computer records
<b>Operational records:</b>				
Vehicles	Keep asset and depreciation records for 6 years after end of financial year to which they relate	Electronically on M drive	Legal	Deletion of computer records
Fire Risk Assessments	1 year after last action	Electronically on O drive	Legal	Deletion of computer records
Policies/Procedures	Reviewed regularly and retained until superseded	Electronically on L drive	Contract/Legal	Deletion of computer records

Complaints	6 years from end of fiscal year	Electronically on M drive	Legal	Deletion of computer records
Building (i.e. lease/deeds)	Destroy 6 years after property is no longer occupied	Electronically on M drive and hard copies in locked Office Manager's cabinet	Contract	Deletion of computer records. Hard copies confidentially shredded
Licence Agreements for satellite office	Destroy 6 years after property is no longer occupied	Electronically on M drive and hard copies in locked Office Manager's cabinet		Deletion of computer records. Hard copies confidentially shredded
Maintenance contracts	Destroy 6 years after property is no longer occupied	Electronically on M drive	Contract	Deletion of computer records
Property plans and surveys	Destroy 6 years after property is no longer occupied or until superseded	Electronically on M drive	Contract	Deletion of computer records
Insurance schedules	12 years after last action	Electronically on M drive	Legal	Deletion of computer records
Pat tests, fire hazard tests	6 years from last action	Electronically on O drive	Legal	Deletion of computer records
Register of members	Life of company	Held with accountants at registered office	Legal	
Memorandum of association	Life of company	Held with accountants at registered office	Legal	
Register of directors and secretaries	Life of company	Held with accountants at registered office	Legal	
Employer's liability insurance certificates	Life of company	Electronically on M drive	Legal	Deletion of computer records
<b>Email records:</b>				
Email correspondence	Kept within the live e-mail system for 2 years after which it is automatically moved to Archive	Electronically in Outlook	Contract	In accordance with our GDPR retention policy