

DATA RETENTION POLICY

1 BACKGROUND

The Clyde Group Ltd (“**Clyde Group**”) has introduced this Data Retention Policy (the “**Policy**”) to define retention periods for information and personal data it holds.

2 UK DATA PROTECTION LAWS

Data protection legislation contains a number of data protection principles that must be followed by those who process personal data or sensitive personal data.

These principles include the requirement that data controllers (including Clyde Group) should not continue to process personal data for longer than is necessary and recognise the need for such data to be destroyed after a certain amount of time.

For more information on Clyde Group’s obligations under data protection laws please refer to the Data Protection Policy.

3 DEFINITIONS

3.1 Data & Information

Organised data encompasses information held in an electronic form (e.g. computers, personal organisers, laptops) or information held manually or in paper form as part of a relevant filing system.

A “**relevant filing system**” means a filing system where information within that system relating to an individual can be easily found and is readily accessible.

3.2 Data Controller

In accordance with the data protection laws, Clyde Group is categorised as the “**data controller**”.

3.3 Data Processor

A “**data processor**” is a legal entity that processes information on behalf of the data controller. For example, a payroll service supplier would be a data processor for Clyde Group as they provide payroll functions and therefore process information on behalf of Clyde Group. Clyde Group will retain responsibility for the information that is passed to a data processor.

3.4 Processing

“**Processing**” covers almost any kind of handling of information including obtaining, recording, holding, organising, adapting, altering, retrieving, consulting, using, disclosing, transmitting, disseminating, aligning, combining, blocking, erasing or destroying.

3.5 **Personal data**

Clyde Group collects data and stores it on different media including, original paper copies, scanning documents and the use of removable media. The type of personal data that Clyde Group processes is set out in the Data Protection Policy.

3.6 We have a Data Compliance Team who are responsible for the control, collection and processing of personal information to ensure that Clyde Group operates effectively and efficiently.

4 **THE DATA RETENTION POLICY**

All data should be retained for no longer than necessary and should be destroyed when no longer necessary.

The Data Compliance Team is responsible for regulating the retention period for information under their responsibility and how often they cleanse that information.

Appendix 1: Document Retention Guidance Table contains tables of appropriate maximum or minimum retention periods. The Data Compliance Team are responsible for deciding on a retention period.

5 **DISPOSAL**

5.1 When a particular document’s retention period has expired, an appropriate review should be carried out before a final decision is made to dispose of the document. No disposal of a document should take place without assurance that:

5.1.1 the document is no longer required by any part of the business;

5.1.2 no work in relation to the document is outstanding;

5.1.3 there is no litigation or investigation current or pending concerning the document;
and

5.1.4 there are no current or pending subject access requests relating to the document.
In the event that a decision is taken to dispose of a document, consideration needs to be given to the method of disposal.

5.2 Disposal can be achieved by various means, for example:

5.2.1 physical destruction on site e.g. shredding;

5.2.2 deletion of electronic files; and/or

5.2.3 off-site disposal by a third party contractor.

5.3 The disposal method should be proportionate to the type of data being disposed of. For example, personal data or confidential information should not be placed in the waste bin. This could result in Clyde Group being in breach of its data protection obligations. Such information should be destroyed on site by shredding or placed in specifically marked “Confidential Waste” bins.

5.4 The disposal of documents identified in this Policy should be documented by keeping a record of the document disposed of, the date and method of disposal and the officer who authorised disposal. In the event of deleting electronic data, managers must ensure that any corresponding records e.g. hard copies in storage and other computer systems etc. must also be deleted.

6 INFORMATION RETENTION RISKS

6.1 **Appropriate Retention**

This policy assists in the identification of the risks associated with certain aspects of Clyde Group’s current business practices and through implementation and application of this policy, Clyde Group seeks to minimise those risks associated with data retention.

Notwithstanding the fact that personal data should not be kept for longer than necessary, there are also several requirements to retain information, e.g. financial information, for a minimum length of time.

6.2 **Timely Destruction**

Clyde Group should ensure that the processing of information is not for excessively long periods, beyond what we have stated in Appendix 1: Document Retention Guidance Table hereto.

6.3 **Information Distribution**

Clyde Group’s business practice is such that Clyde Group could retain the same piece of information in many different ways (e.g. for customer information; as a paper file, as a scanned document, Word document, email and as a voice recording) and therefore with such duplication across departments there is a risk of non-compliance with our retention periods. Where possible, all copies should be disposed at the same time.

6.4 **Security**

Security measures are vital to protect the integrity of the records held by Clyde Group. It is important that unauthorised persons are not able to “come across” personal or sensitive data

either because the data was not kept securely or because the data was not destroyed/deleted in accordance with this policy.

7 **REVIEW**

7.1 The Policy is subject to review annually, or in response to any relevant changes.