

DATA RETENTION POLICY WITH SCHEDULE
of
Clearview Comms

Introduction

As part of the day-to-day 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 stored both as a hard copy and in electronic form.

Aims of the policy

Our business will ensure that the 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 fulfil our statutory obligations and the provision of goods or/and services – as required by data protection legislation, including the General Data Protection Regulation (GDPR).

Retention

This retention policy (along 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 are to be taken in accordance with this policy.

As and when the retention period for a specific document has expired, a review is always to 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 is to be given to the method of disposal.

Responsibility

Susan-Marie Smith is responsible for keeping this retention schedule up to date in order to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business.

Susan-Marie Smith is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

Susan-Marie Smith may delegate the operational aspect of this function to Kirk Ward.

Kirk Ward] should inform Susan-Marie Smith if there is any doubt about the minimum retention periods or if the retention of a document is necessary for a potential claim.

Disposal

Our business must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- 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 Susan-Marie Smith without delay.

Date created: 24 September 2024.

Appendix 1: Document retention schedule

Commercial contracts:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contracts with suppliers	6 years after last action	Cloud storage	Supply contract	Digital Shredder
Contracts signed as a deed	12 years after last action	Cloud storage	Supply contract	Digital Shredder
Guarantees and indemnities	The term of the guarantee plus 6 years	Cloud storage	Supply contract	Digital Shredder
Purchase orders and invoices	7 years after last action	Cloud storage	Supply contract	Digital Shredder

Marketing records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Mailing lists	1 year after last action	Online mailing platform	To assist with audit	Platform deletion

Tax and Accounting Records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Tax returns	10 years from end of fiscal year	Cloud storage	Audit	Digital Shredder
Accounting & financial management information	6 years from end of fiscal year	Cloud storage	Audit	Digital Shredder
Stock transfer forms and share certificates	20 years from purchase	Cloud storage	Audit	Digital Shredder

Operational records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Vehicles	Keep asset and depreciation records for 6 years after end of financial year to which they relate]	Cloud storage	Audit	Digital Shredder
Policies/Procedures	7 years	Cloud storage	Audit	Digital Shredder
Complaints	6 years from end of fiscal year	Cloud storage	Issue is generally resolved upon response	Digital Shredder
Website FAQs	6 months from last action	Cloud storage	Audit	Digital Shredder
Insurance schedules	[10] years after last action	Cloud storage	Audit	Digital Shredder
Employer's liability insurance certificates	Life of company	Cloud storage	Audit	Digital Shredder

Intellectual property records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Copyright material	50 years from expiry	Cloud storage	Audit	Digital Shredder

Email records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Email correspondence	Archive emails after 6 months	Cloud storage	Audit	Email provider archive