

GDPR - DATA RETENTION POLICY WITH SCHEDULE

This is the Data Retention Policy of Thomas Miller Creative Ltd

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 fulfil 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.

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 This will reduce the risk that it will become inaccurate, out of date or irrelevant.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 wastepaper 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 Sue Thomas or Tim Miller without delay.

Date created: 1st January 2019

Date of review: 1st January 2020

Appendix 1: Document retention schedule

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Employment records:				
PAYE records	6 years from end of fiscal year	Thomas Miller Financial Controller	Legal	Hard copy shred/Deletion of Computer records
Maternity and paternity pay records	6 years from end of fiscal year	Thomas Miller Financial Controller	Legal	Hard copy shred/Deletion of Computer records
Medical and health records	3 years after employment ceases	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Unsuccessful candidates	6 months after last action	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Accident report forms	3 years after last action	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Parental leave records	5 years from birth of child	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Employment records: redundancy, equal opportunities; health & welfare records	6 years after last action	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Employees that left the business: emergency contacts and bank account details	Deleted 3 months after making final salary payment	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Pay & tax: pay deductions, tax forms, payroll, loans	6 years after last action	Thomas Miller Financial Controller	Legal	Hard copy shred/Deletion of Computer records
Records of formal disciplinary actions in employee file	6 years after last action	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Records of formal grievances in employee file	6 years after last action	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Commercial contracts:				
Contracts with suppliers	6 years after last action	Thomas Miller Office Manager	Contractual agreement	Hard copy shred/Deletion of Computer records

Guarantees and indemnities	The term of the guarantee plus 6 years	Thomas Miller Financial Controller	Legal	Hard copy shred/Deletion of Computer records
Purchase orders and invoices	6 years after last action	Thomas Miller Financial Controller	Audit	Hard copy shred/Deletion of Computer records
Tax and Accounting Records:				
Tax returns	6 years from end of fiscal year	Thomas Miller Financial Controller	Legal and Audit	Hard copy shred/Deletion of Computer records
Accounting & financial management information	6 years from end of fiscal year	Thomas Miller Financial Controller	Legal and Audit	Hard copy shred/Deletion of Computer records
Marketing records:				
Mailing lists	1 year after last action	Thomas Miller Directors	To assist with audit/fulfilment check	Hard copy shred/Deletion of Computer records
Operational records:				
Closed circuit television recordings	Destroy 4 weeks from the date recorded except where required as evidence	Landlord	Contractual/legal	Deletion of Computer recording
Fire Risk Assessments	Retain until superseded	Landlord	Contractual/legal	Hard copy shred/Deletion of Computer records
Policies/Procedures	6 years	Thomas Miller Office Manager	Contractual/legal	Hard copy shred/Deletion of Computer records
Complaints	6 years from end of fiscal year	Thomas Miller Directors	Contractual/legal	Hard copy shred/Deletion of Computer records
Building lease/deeds	Destroy 6 years after property is no longer occupied	Landlord	Contractual/legal	Hard copy shred/Deletion of Computer records
Website FAQs	6 months from last action	Thomas Miller Directors	Issue is generally resolved upon response	Hard copy shred/Deletion of Computer records
Property plans and surveys	25 years	Landlord	Contractual/legal	Hard copy shred/Deletion of Computer records
Insurance schedules	6 years after last action	Thomas Miller Office Manager	Contractual/legal	Hard copy shred/Deletion

				of Computer records
Pat tests, fire hazard tests	1 year from last action	Landlord	Contractual agreement	Hard copy shred/Deletion of Computer records
Memorandum of association	Life of company	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Register of directors and secretaries	Life of company	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Employer's liability insurance certificates	Life of company	Thomas Miller Office Manager	Legal	Hard copy shred/Deletion of Computer records
Intellectual property records:				
Copyright material	50 years from expiry	Thomas Miller Directors	Legal	Hard copy shred/Deletion of Computer records
Email records:				
Email correspondence	Archive emails after 12 months	Thomas Miller Directors	Project History	Computer Back Up – external drive off site