

**Personal Data Records Retention Policy**

**Policy Statement**

Taziker Industrial Ltd implements a records and data retention schedule applicable to the business IT and structured filing systems that relate to Personal and or Special Category Data, to ensure compliance to the General Data Protection Regulations 2018.

**Scope**

This policy covers Personal and Special Category Data records stored in company provided structured filing and IT systems, and includes authorised access via mobile devices, at all Taziker Industrial Ltd controlled premises and work sites.

**Policy Governance**

The following table identifies who within Taziker Industrial Ltd is Accountable, Responsible, Informed or Consulted with regards to this policy. The following definitions apply:

- **Responsible** – the person(s) responsible for developing and implementing the policy.
- **Accountable** – the person who has ultimate accountability and authority for the policy.
- **Consulted** – the person(s) or groups to be consulted prior to final policy implementation or amendment.
- **Informed** – the person(s) or groups to be informed after policy implementation or amendment.

<b>Responsible</b>	Anthony Brooke - Data Privacy Officer
<b>Accountable</b>	Paolo Benedetto – Group Managing Director
<b>Consulted</b>	Rob Usher – Head of Group HSQE Jason Worrall – Sales Director Jane Ratcliffe – Chief Financial Officer Jenny Baker – Group HR Manager Andy Gill – Group IT Manager Rebecca Pope – Commercial Manager
<b>Informed</b>	All Directors, Managers and Administrative Staff within the business

**References**

The following policies and procedures are directly relevant to this policy, and are referenced as follows:

- Data Protection Policy;
- Data Handling & Security Policy;
- Information Security Policy;
- IT Access Control Policy;
- IMS 3.3 Control of Records Procedure;
- IMS 3.3.1 Data Handling & Security Procedure.

**Records Retention & Disposal**

The company does not adopt a "save everything" approach to personal data records retention, as it would not be compliant with legislative requirements. Compliance with the Principles of Data Protection in respect of Personal or Special Category Data must be strictly adhered to. The retention schedule is a live document that is reviewed and updated as necessary. The relevant departmental heads are required to implement this policy. Information will only be retained for as long as the data is processed and held in respect of a living individual.

**Retention Periods** (not limited to under the GDPR definition of Personal Data)

Record	Storage Medium	Retention Period Guide
Job Application form, interview notes, rejection letter and CV (including on-spec) for unsuccessful candidate	Hard Copy or Electronic	6 Months
Job Application form, interview notes, job offer letter, references, contract of employment particulars and CV for Employee	Hard Copy or Electronic	6 years after termination of employment
Employee name, address, next of kin, emergency contact, date of birth, education and qualifications, national insurance number, training, development and performance assessment records, Equal opportunities and identifiable Diversity data, disciplinary and grievance investigation and hearings records, Employment tribunal documentation records, appraisals, Right to Work in the UK information, Passport photo, driving licence details, reasonable adjustments arrangements and correspondence or supporting documentation, flexible working agreements, employee background checks and CRB enquiries, annual leave, Dr's certificates, employment compromise agreement	Hard Copy or Electronic	6 years after termination of employment  (See ACAS Personal Data and Record Keeping Guidance and ICO The Employment Practices Code)
PPE Issue Records	Hard Copy or Electronic	12 months
Records documenting an employee's absence due to sickness	Electronic	3 years from the end of the tax year they relate to
Employee and ex-employee Wage/salary records (also overtime, bonuses, expenses) bank details, tax code and other financial records, promotion and transfers	Hard Copy or Electronic	6 years
Statutory Maternity/Paternity Pay records and calculations	Hard Copy or Electronic	3 years from the end of the tax year they relate to



		to be kept, otherwise 5 years
Security CCTV	Electronic	3 months
Vehicle Tracking Data	Electronic	5 years
Customer Relationship Management Database – prospective client personal data	Electronic & Hardcopy	For as long as the data is processed and held in respect of a living individual
Existing client/contract personal data	Electronic & Hardcopy	For as long as the data is processed and held in respect of a living individual

**Hard Copy Records Destruction**

Once records reach the retention date, they must be confirmed for deletion by the accountable person, and then securely destroyed in such a way that Personal Data cannot be recovered from the process.

**Electronic Records Deletion**

Deletion of records held on business IT systems, mobile devices must be deleted using the appropriate system tools. Deletion of records from an electronic system does not necessarily mean they are destroyed, thus all copies, back-ups or duplicates held in any media that are known to exist, must also be deleted or destroyed before effective destruction can be said to have taken place.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.



**Paolo Benedetto**  
Group Managing Director  
7th January 2020