



Data Retention Policy

Introduction

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements or maintaining accurate records. We have varying retention periods for different categories of information depending on our legal obligations and administrative needs.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may continue to use such information in that form without further notice.

Once a retention period has elapsed, the data is deleted or securely destroyed.

Data Retention – Employees

The below table defines employee data categories and their subsequent retention periods. A more detailed data audit has been completed and is reviewed annually as a minimum requirement.

| Category | Data Subject | Retention Period |
|--|---|---|
| Recruitment Documents | Unsuccessful candidate, employee, former employee | 6 months after recruitment campaign ended |
| Recruitment Documents | Talent pool candidates | 12 months after recruitment campaign ended |
| Right to Work documents | Employee, former employee | 2 years after leaving |
| Contractual employment information | Employee, former employee | Physical documents - 2 years after leaving, once the employee left we only retain the most recent employment contract Electronic documents – 7 tax years after employee leaving date |
| Pay and tax related documents | Employee, former employee | 7 tax years |
| Performance records | Employee | Maximum 5 years or upon leaving |
| Employee Relations records – dismissal, ET11 claims, settlement agreements, capability documentation | Employee, former employee | 3 years |
| Employee Relations records – consultation documentation | Employee, former employee | 6 years |
| Employee Relations records – file notes, informal actions, appeal, suspension grievance, warning letters, trackers | Employee, former employee | 2 years |



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|---|---------------------------|---|
| Absence records | Employee, former employee | 7 tax years |
| Health and Safety Documentation - Accidents at work and work-related illness | Injured party | Minimum three years after the end of the reported event maximum four years |
| Health and Safety Documentation - Risk Assessment | Employee | Minimum three years after the end of the reported event maximum four years |
| Health and Safety Documentation - RIDDOR , COSH | Injured party | Minimum three years after the end of the reported event maximum four years |

Data Retention – Customers

| Category | Data Subject | Retention Period |
|--|--------------|--|
| Contact details and delivery address information | Customers | Three years following the last communication from the customer or last transaction date whichever is later |

In the event that there are any category of documents or data not specifically defined elsewhere in this policy, the necessary retention period for such document will be guided by the applicable laws or as long as legitimately required.

Data Deletion

Data will be deleted, shredded or otherwise destroyed once the retention period has been exceeded. Any data deletion will take into account the nature of confidentiality and sensitivity. The data deletion will be performed:

- By an appropriate person
- Using an appropriate method of deletion