

**Date: 1<sup>st</sup> May 2018**

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**Data Retention Policy**

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## **1. Personal Data Retention Periods**

- 1.1. Except as otherwise permitted or required by applicable law or regulation, Pro-Innovation Solutions Limited (“we”) only retains personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.
- 1.2. To determine the appropriate retention period for personal data, we have considered the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether we, as employer, can fulfil the purposes of processing by other means, and any applicable legal requirements.
- 1.3. Pro-Innovation Solutions Limited typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

## **2. Information about Customers**

- 2.1. Customer data will be held in accordance with our privacy notice and any consent received when the Personal Data was provided.

### **Retention Period:**

- 2.2. personal details including name and contact information: 5 years or any other agreed contractible period;
- 2.3. [family and lifestyle details: years;] (Not applicable)
- 2.4. [device details: [NUMBER] years;] (Not applicable)
- 2.5. user activity details and user preferences: 5 years or any other agreed contractible period;
- 2.6. browser history details: [NUMBER] years; (Not applicable)
- 2.7. location details: 5 years or any other agreed contractible period;
- 2.8. electronic identification data including IP address and information collected through cookies: (Not applicable – Not kept)
- 2.9. Contractual details including the goods and services provided: 5 years or any other agreed contractible period;
- 2.10. Deeds: (Not applicable)
- 2.11. [Service]: 5 years or any other agreed contractible period;

## **3. Information about job applicants**

- 3.1. On application to the company we will receive certain data to enable us to carry out the recruitment process.

- 3.2. Where an application is successful, we shall add the personal data provided, to our employee records and retain it in accordance with clause 4.
- 3.3. Where an application is unsuccessful we shall retain the application form in order to consider you for other roles in the future and in the event of a legal claim, that we have not discriminated against candidates, unless you specifically state during the recruitment process that you do not wish us to retain your data.
- 3.4. The data retained under clause 3.3. above shall be collected from the Application form and retained for: 6 months after receipt of the application the form which shall include:
  - 3.4.1. Gender;
  - 3.4.2. government identification numbers;
  - 3.4.3. education and training details;
  - 3.4.4. employment details;
  - 3.4.5. special categories of personal data, including information that may relate to an racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health.
- 3.5. Where data is retained for statistical purposes it will be anonymised as much as possible.

#### **4. Information about employees**

- 4.1. When you are appointed to your new role, your personal data will be collected in order for us to perform our obligations as your employer. We shall retain your data for the duration of your employment.
- 4.2. When you leave your employment (in any circumstances) we shall retain your data as set out below:
  - 4.2.1. personal details including name: 7 years;
  - 4.2.2. contact information: [6] years;
  - 4.2.3. date of birth: [7] years;
  - 4.2.4. gender: [7] years;
  - 4.2.5. marital status: immediate deletion/destruction;
  - 4.2.6. beneficiary and emergency contact information: immediate deletion/destruction;
  - 4.2.7. government identification numbers: 7 years;
  - 4.2.8. education and training details: [7] years;
  - 4.2.9. bank account details and payroll information: [7] years;
  - 4.2.10. wage and benefit information: [7] years;
  - 4.2.11. performance information: immediate deletion/destruction;

- 4.2.12. employment history: immediate deletion/destruction;
- 4.2.13. Special categories of personal data, including information that relates to an employee's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics or health, and sex life or sexual orientation: where possible such data will be anonymised but if not it will be retained for [3] years.

### **References**

- 4.3. Our policy is to provide a basic reference confirming your employment dates and role within the company and sufficient data will be held for these purposes.
- 4.4. However references will only be provided up to 3 years after your employment ends.

## **5. Information about vendors or suppliers**

- 5.1. Vendor/supplier personal data will be held in accordance with our privacy notice any relevant contractual provisions entered into between us and any consent received when the Personal Data was provided.

### **Retention Period:**

- 5.1.1. name and contact information: duration of contract;
- 5.1.2. financial and payment details: duration of contract.
- 5.1.3. other specific information: duration of contract