

# DATA RETENTION SCHEDULE

## Introduction

This data retention policy sets out the obligations of Sparks Property and illustrates the basis upon which we shall retain, review, and destroy data held by us, or within our custody or control.

## Objectives

It is necessary to retain and process information to enable our business to operate.

### **We may store data in the following places:**

- Our own servers
- Third party servers
- Email accounts
- Desktops
- Employee owned devices (BYOD)
- Devices owned by subcontractors
- Potential backup storage; and / or
- Our paper files

This policy applies equally to paper, electronic media and any other method used to store personal data. The period of retention only commences when the record is closed.

We are bound by various obligations under the law in relation to this and therefore, to comply with law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully in respect of their personal data under the General Data Protection Regulation.

This policy sets out the procedures that are to be followed when dealing with personal data and how we aim to comply with the Regulation in so far as it is possible.

### **In summary, the Regulation states that all the personal data shall be:**

- a) Processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- b) Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with these purposes; further processing for archiving purposes shall not be compatible with the initial purposes;

- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer that is necessary for the purposes for which the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We ensure that any data should not be kept any longer than necessary for the purpose for which it is processed and when it is no longer required, it shall be deleted and that the data should be adequate, relevant and limited for the purpose in which it is processed.

This policy should be read in conjunction with our other policies which are relevant such as our Fair Processing Notice.

## Security and Storage

All data and records are stored securely to avoid misuse or loss.

We put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if there is an agreement by them to comply with those procedures and policies, or if there are adequate measures in place.

### **Examples of our storage facilities are as follows:**

- Password protected laptop and/or PC
- Locked security cabinet for paper files
- Encrypted email systems
- Password protected and encrypted mobile phone

### **We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:**

- a) Confidentiality means that the only people who are authorised to use the data can access it.
- b) Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.
- c) Availability means that the authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on the Company's central computer system instead of Individual PCs.

# Retention Policy

Data retention is defined as the retention for a specific period and for the back-up purposes.

We shall not keep any personal data longer than necessary but acknowledge that this will be dependent on the different types of documents and data that we have responsibility for. As such, our general data retention period shall be for the period of 6 years to fall in line with the recommended file storage for financial records.

## Our specific data retention period is set out below:

Type of Data Subject	Type of Data	Type of Processing	Purpose of Processing	Type of Recipient to whom personal data is transferred	Retention Period	Data Accuracy and Minimisation Review Date
Customers	Name, address, telephone numbers, business name, email address	Recording, organising, storage, dissemination, and use	Tenancy Administration, Invoicing, bookkeeping, emailing, CRM.	Directors of company and employees	6 years from last contact	2 Years
Customers	Copies of Passports, driving licence	Recording, organising, storage, dissemination, and destruction	Tenancy Administration	Directors of company and employees	2 years from last contact	2 years
Business Contacts	Name, address, telephone numbers, business name, email address	Recording, organising, storage, dissemination, and destruction	Retained in CRM, emailing, supplier queries	Potential customers/ clients of business contact.	Indefinitely	6 years
Contractors	Name, address, telephone numbers, business name, email address	Recording, organising, storage, dissemination, and destruction	Invoicing, payments, CRM, emailing regards support	Directors of company and employees	6 years	6 years
Potential Employees	Application form/ CV	Recording, organisation, storage, use, erasure, and destruction.	Information regarding skill base and relevant experience	Directors of Company	6 Months from application unsuccessful date	Not Applicable

Type of Data Subject	Type of Data	Type of Processing	Purpose of Processing	Type of Recipient to whom personal data is transferred	Retention Period	Data Accuracy and Minimisation Review Date
Suppliers	Name, address, telephone numbers, business name, email address, bank details	Recording, organising, storage, dissemination, and destruction	Invoicing, payments, CRM, emailing regards support	Tenants and othersuppliers in need of supplier.	Indefinitely	2 years
Employees	Name, address, telephone number, email address, bank details	Payment, contact, storage, organising	Payments, HR, emailing, contact.	Directors of Company	2 years from leave date	2 years

From time to time it may be necessary to retain or access historic personal data under certain circumstances such as if we have contractually agreed to do so or if we have become involved in unforeseen events like litigation, tax investigation or business disaster recoveries.

## Destruction and Disposal

Upon expiry of our retention periods, we shall delete confidential or sensitive records categorised as requiring high protection, and we shall either delete or anonymise less important documents.

Our Directors Steven & Carolyn Sparks are responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personal-related records shall be securely destroyed electronically or by shredding.

### **This Policy has been approved and authorised by:**

Carolyn Sparks

Director

16 September 2020

Due for renewal on 16 September 2021