**Data Retention Policy**

Having completed an audit of the data held by Plastica Ltd, the General Data Protection Regulations requires the Company to have in place a Data Retention Policy that clearly defines how long we will hold your personal data, together with the reasoning behind the decision to hold that data.

Save for exceptional circumstances which must be raised with, and approved by, all personal data must be retained in accordance with this policy. Often, in respect of certain types of information, we are under a legal obligation to retain the information for a minimum period of time. Where this is the case, the minimum time we have stipulated is the same as the time required under law. Furthermore, there are occasions where it is appropriate for us to retain personal data for longer than the period prescribed in law (for example, where there may be litigation in process or expected where the data will form part of the evidence for this case). In such circumstances the requirements of the litigation will override the policies outlined below.

Plastica Ltd is committed to enforcing this policy as it applies to all forms of data. The effectiveness of Plastica’s efforts, however, depends largely on employees. If you feel that you or someone else may have violated this policy, you should report the incident immediately to your Manager. If you are not comfortable bringing the matter up with your Manager, or you do not believe the Manager has dealt with the matter properly, you should raise the matter with a Senior Manager or the Data Protection Officer. If employees do not report inappropriate conduct, Plastica may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action. No one will be subject to and Plastica prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations.

Where this is a requirement for the Company to retain information for longer periods of time, consideration must be given to whether any personal data within it should be ‘anonymised’ such that the data subject can no longer be identified but the contents and context of the document still reviewed and understood. Where, in the table below, the data is identified as being capable of being anonymised, anonymisation should take place as soon as reasonably possible once the need to retain the personal data has expired.

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| **Type of Data Held** | **Location of Data** | **Source of Data** | **Reason for Data Being Held** | **Retention Period** | **Reason for Retention Period** | **Delete/ Anonymise** |
| Full Name | PC, Network Attached Storage, Payroll Company Software, Pension Company Software, Westfield Health and BDHL (broker) and Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment (Pension Company may retain this for longer) | Claims can be brought up to 6 years after the end of employment so this information may be needed in the event of a claim being brought | Delete |
| Date of Birth | PC, Network Attached Storage, Cloud (encrypted), Payroll Company Software, Pension Company Software, Westfield Health and BDHL (broker) and Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Full Address | PC, Network Attached Storage, Cloud (encrypted), Payroll Company Software, Pension Company Software, Westfield Health and BDHL (broker) and Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Previous Address | Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 months after record is updated | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Telephone Numbers | PC, Network Attached Storage, Cloud (encrypted), Payroll Software and Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| **Type of Data Held** | **Location of Data** | **Source of Data** | **Reason for Data Being Held** | **Retention Period** | **Reason for Retention Period** | **Delete/ Anonymise** |
| Personal Email Address | PC, Network Attached Storage, Cloud (encrypted), Physical Files, Pension Company Software | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment (Pension Company may retain this for longer) | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Gender | Payroll Software, Physical Files. Pension Company Software | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment (Pension Company may retain this for longer) | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Marital Status | PC, Network Attached Storage, Cloud (encrypted), Payroll Company Software, Pension Company Software, Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Next of Kin and Emergency Contact Information | Payroll Software, Physical Files | Employee as part of fair processing notice | Contractual Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| National Insurance Number | Payroll Company Software, Physical Files, Pension Company Software | Employee as part of fair processing notice | Contractual Obligations | 7 years after having left employment (Pension Company may retain this for longer) | Tax Reporting Purposes | Delete |
| Bank Details and Tax Codes and Payroll Information (incl. Salary) | Payroll Software, Physical Files | Employee as part of fair processing notice | Contractual Obligations | 7 years after having left employment | Tax Reporting Purposes | Delete |

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| Copy of Driving Licence | Physical Files | Employee as part of fair processing notice | Contractual Obligations and Legal Obligations | 1 year after having left employment | If details are required in the event of an insurance/police investigation | Delete |
| Car Registration, Make and Model Details | Physical Files | Induction Form | Site security | 6 years after having left employment | For identification of vehicles as part of our site security | Delete |
| Medical Information (i.e. relating to disabilities or medical information that may be needed) | Physical Files | Employee, Medical Professional, Occupational Health | Contractual Obligations and Legal Obligations  Vital Interests  To enable us to ensure your health and safety in the workplace, to assess your fitness for work, to provide reasonable adjustments where necessary and to monitor and manage sickness absence and administer pay and benefits. | Upon leaving employment unless the data needs to be retained for the purposes of reporting or compliance with our legal obligations, in which case it will be retained for 6 years after leaving employment | These records are classed as sensitive personal data, there is no need for the company to have any information relating to an employee’s medical history after they leave employment unless it needs to be retained in accordance with our legal obligations, including under the Equality Act 2010 | Delete |
| Race, Religion, sexual orientation | Physical Files | Employee | Contractual Obligations  Legal Obligations  To ensure equal opportunities | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |

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| Contract of Employment | PC, Network Attached Storage, Cloud (encrypted), Physical Files | Contract of Employment | To ensure all employee records are accurate and to ensure both the company and its employees are complying with the terms of the contract of employment | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Disciplinary History | PC, Network Attached Storage, Cloud (encrypted), Physical Files | Internal records kept with HR | To ensure employee records are up to date and accurate | Upon expiry of disciplinary action or 6 years after termination of employment, whichever is sooner | Many disciplinary notes expire after a set period and should be removed from the record upon expiry. Some, however, will need to be kept on record as evidence in the event of an employment tribunal claim or other litigation, or for regulatory reasons | Delete |
| Performance Management Information | PC, Network Attached Storage, Cloud (encrypted), Physical Files | Employee  Internal records | Contractual Obligations  Legal Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Grievances | PC, Network Attached Storage, Cloud (encrypted), Physical Files | Employee  Internal records | Contractual Obligations  Legal Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |

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| CVs | Physical Files | Employee and/or Recruitment Agency | To enable the assessment of candidates for jobs | 12 months after unsuccessful application or 6 years after having left employment | To enable the defence of any claims arising out of rejected application or full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Criminal Records | Physical Files | Employee and/or background checking service | To ensure that the employee is not prohibited from undertaking the employment and to ensure the Company is not putting employees or third parties at risk | Upon the expiry of the rehabilitation period or 6 months after termination of employment, whichever is sooner. | Criminal records are highly sensitive information and the retention policy balances the requirements of the Company against the rights of the subject and the harm that could be caused by the loss of this data. | Delete |
| Right to Work Documentation | Physical Files | Employee  HMRC  Home Office | Contractual Obligations  Legal Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| CCTV (hard copies of specific instances), Time and Attendance Fob Records | PC, Network Attached Storage, Cloud (encrypted), Physical Files | Employee, CCTV camera | Contractual Obligations  Legal Obligations | 1 year after having left employment | Retained in case of future requirement with regards to investigation into work during employment | Delete |
| CCTV recordings (not hard copies) | PC, Network Attached Storage | CCTV camera | To cover the provisions of our CCTV Policy (crime prevention, accident investigation, stock investigations etc.) | 6 months | To aid with crime prevention, accident investigations, stock investigations etc. | Delete |
| Telephone recordings/ Voicemails | Phone system (PC), Cloud (encrypted) | 3CX, employee | Legal Obligations, order accuracy and other administrative tasks | 6 months | To enable investigations to be undertaken or identifying further training required. | Delete |
| **Type of Data Held** | **Location of Data** | **Source of Data** | **Reason for Data Being Held** | **Retention Period** | **Reason for Retention Period** | **Delete/ Anonymise** |
| Employment History (training records, working hours, job titles, salary information etc.) | PC, Network Attached Storage, Cloud (encrypted), Physical Files, Payroll Company Software, Pension Company Software | Employee  Contract of Employment  Training Provider  Internal Records | Contractual Obligations  Legal Obligations | 6 years after having left employment | Full file is retained in case of any future requirement (e.g. contact details, claims brought). | Delete |
| Accident Forms and associated Accident Investigations | PC, Physical Files, RIDDOR Notifiable (www.hse.gov.uk) | Employee or First Aider | Contractual Obligations  Legal Obligations | 4 years after date of accident | Retained in case of future requirements with regards to investigations or claims | Delete |
| Signature | PC, Physical Files, Paperwork | Employee | Confirmation of Contractual Obligations and Legal Obligations | Up to 7 years after having left employment | Retained in case of any future requirement including confirmation of work and understanding | Delete |
| Photographs | PC, Physical Files, Network Attached Storage, Cloud (encrypted), websites and marketing literature | Employee | For marketing purposes | Indefinite (assuming permission has been given) | Once marketing material has released we have no further control over its retention. | Right to request deletion at Plastica Ltd source. |

The Data Retention Audit was completed in May 2018, this document is subject to updates and revisions as required. This list has been compiled from the audit as all the sources of personal information, it may not be exhaustive, and is therefore subject to change. For an up to date list refer to the Company Intranet.