Approved

Data Retention Policy

Data Retention Policy

1. This policy relates to all types of data and ensures that all data which should be retained are appropriately stored and managed.

2. The General Data Protection Regulation {GDPR} owner is responsible for data storage and subsequent destruction under agreed procedures.

3. Department heads are responsible for records relating to their departments so that-

- The Company Secretary (CFO) is responsible for retention of all non-specific statutory and regulatory records
- The Finance Director (CFO) is responsible for retention of financial and related records
- The Health and Safety Officer (Operations Director) is responsible for retention of all Health and Safety records
- The Head of HR (Ventura) is responsible for retention of all HR records
- All managers (EXCO) involved in succession planning, disaster recovery planning and business continuity will include this issue of retained data in their plans.

4. The GDPR owner will identify data retention period length and/or criteria used to determine the retention period length; the type of data involved, details and operation of the retention medium and the justification for retention. The GDPR owner will also identify and record the disposal method.

5. Each stored data asset will be marked by the assigned person with:-

- name of the record
- record type
- original owner of the data
- identified retention period
- planned date of destruction
- information relating to special data such as cryptography.

CEME Data Locations.xlsx

6. The GDPR owner will ensure all data relating to the following are retained:-

- Cryptographic keys required for access and all other means to access that data
- A risk assessment to ensure we do not exceed 90% of manufacturer's recommended storage life for storage media
- Logs of data for disposal as part of general disposal records.

7. The GDPR owner will establish a procedure for dealing with Freedom of Information requests including how access is authorised, and how data are protected from loss, destruction or falsification during the process.