

Data Retention Policy

Having completed an audit of the data held by Pure Retirement, the Data Protection Act 2018 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, the Head of Compliance & Risk, 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 in the case). In such circumstances the requirements of the litigation will override the policies outlined below.

Pure Retirement is committed to enforcing this policy as it applies to all forms of data. The effectiveness of Pure Retirement's efforts, however, depends largely on its 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 do not believe the Manager has dealt with the matter properly, you should raise the matter with the Head of Compliance & Risk.

If employees do not report inappropriate conduct, Pure Retirement 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 Pure Retirement 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 there 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.

Data Retention Table

Type of Data Held	Location of Data	Source of Data	Reason for Data Being Held	Retention Period Current/Ex-employee	Retention Period for Unsuccessful Job Applicant	Reason for Retention Period	Delete/Anonymise
Full Name	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	6 years after having left employment	12 months	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.	Anonymise
Dates of employment	Hard drive, HR Management System (People HR)	Internal records kept with HR	Contractual Obligations	6 years after having left employment	N/A		Delete
Date of birth	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	6 years after having left employment	12 months		Delete
Full address	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	1 year after having left employment	12 months		Delete

Previous addresses	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	6 months after record is updated.	N/A	The information may be needed for a short period after it has been changed to confirm previous address history.	Delete
Telephone numbers	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	1 year after having left employment	12 months		Delete
Personal email address	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	1 year after having left employment	12 months		Delete
Gender	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	1 year after having left employment	12 months		Delete
Marital status and dependants	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations	1 year after having left employment	N/A		Delete
Next of kin and emergency contact information	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations Vital Interests	Upon leaving employment	N/A		Delete

National Insurance Number	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations Legal Obligations	7 years after having left employment	N/A	Tax reporting purposes	Delete
Bank details	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations Legal Obligations	6 months after having left employment	N/A		Delete
Tax Codes	Hard drive, HR Management System (People HR)	Employee as part of fair processing notice	Contractual Obligations Legal Obligations	7 years after having left employment	N/A	Tax reporting purposes	Delete
Payroll Information This information includes the following embedded data, which, when held as part of our payroll obligations, have a longer retention period than that which applies to the same data types held on other systems for other purposes, listed	Hard drive, HR Management System (People HR) (Payroll company – Garbutt & Elliott)	Employee as part of fair processing notice	Contractual Obligations Legal Obligations	7 years after having left employment	N/A	Tax reporting purposes	Delete

<p>separately in this document:</p> <p>Full name; Address; NI Number; Date of Birth; Telephone number; Email address; Bank Details; Full history of payrolls processed including payslips; Mandated deductions.</p>							
<p>Copy of driving licence</p>	<p>Hard drive, HR Management System (People HR)</p>	<p>Employee as part of fair processing notice</p>	<p>Contractual Obligations Legal Obligations</p>	<p>1 year after having left employment</p>	<p>12 months</p>		<p>Delete</p>
<p>Medical information (i.e. information relating to disabilities or medical information that may be needed).</p>	<p>Hard drive, HR Management System (People HR)</p>	<p>Employee, Medical Professional, Occupational Health Provider (Medigold).</p>	<p>Legal Obligations Vital Interests To enable us to ensure your health and safety in the workplace, to assess your fitness for work, to provide</p>	<p>Upon leaving employment unless the data needs to be retained for the purposes of reporting or compliance with our legal</p>	<p>N/A</p>	<p>These records are classed as sensitive personal data, there is no need for the company to have any information relating to an employee's</p>	<p>Delete</p>

			reasonable adjustments where necessary and to monitor and manage sickness absence and administer pay and benefits.	obligations, in which case it will be retained for 6 years after leaving employment.		medical history after they leave employment unless it needs to be retained in accordance with our legal obligations, including under the Equality Act 2010	
Race, religion, sexual orientation (anonymised data)	Hard drive, HR Management System (People HR)	Employee	Legal Obligations Consent/Explicit Consent To ensure equal opportunities	6 years after leaving employment	12 months	Claims can be brought up to 6 years after the end of employment, so this information may be needed in defence of a claim.	Anonymise
Contract of employment including any changes to the terms, such as flexible working requests.	Hard drive, HR Management System (People HR)	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 leaving employment	N/A	Claims can be brought up to 6 years after the end of employment, so this information may be needed in defence of a claim.	Delete

Information about use of our electronic systems	Hard drive, HR Management System (People HR)	Employee, Internal computer systems.	Contractual Obligations Legal Obligations	1 year after having left employment	N/A		Delete or anonymise
Disciplinary history	Hard drive, HR Management System (People HR)	Internal records kept with HR	Legitimate Interests: 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.	N/A	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	Hard drive, HR Management System (People HR)	Employee, Internal records.	Legitimate Interests: To improve productivity and aid in the calculation of remunerative increase	1 year after having left employment	N/A		Delete

Grievances	Hard drive, HR Management System (People HR)	Employee, Internal records.	Contractual Obligations Legal Obligations	6 years after leaving employment	N/A	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
CVs	Hard drive, HR Management System (People HR)	Employee and/or recruitment agency	Legitimate interest: To enable the assessment of candidates for jobs.	12 months after unsuccessful application	12 months	To enable the defence of any claims arising out of a rejected application.	Delete
Criminal records	Hard drive, HR Management System (People HR)	Employee and/or background checking service (Atlantic Data).	Legal obligations Legitimate interests: 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.	Upon rejection of candidate	Criminal records are highly sensitive information and the retention period 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

Background checks and searches plus credit report	Hard drive, HR Management System (People HR)	Background checking service (Atlantic Data), Former employers, Other referees, Educational Provider, employee.	Legal obligations Legitimate interests: To ensure applicants are not prohibited from being employed in the role in question or prohibited from undertaking certain aspects of the role in question and/or to assess suitability for employment.	Unless required to be kept by a code of practice or regulator, such records should be deleted upon the employee successfully passing their probation period.	Upon rejection of candidate	Once an applicant becomes an employee and has successfully passed probation this information is no longer required. This is only overridden where a regulator or code of practice obliges us to retain this information for a longer period of time	Delete
Right to work documentation	Hard drive, HR Management System (People HR)	Employee, HMRC, Home Office.	Contractual Obligations Legal Obligations	2 years after having left employment	12 months		Delete
Employment history (training records, CPD, working hours, job titles, salary information, details of family-related leave)	Hard drive, HR Management System (People HR)	Employee Contract of employment Training provider Internal records	Contractual Obligations Legal Obligations	1 year after having left employment	N/A		Delete

Qualifications	Hard drive, HR Management System (People HR)	Employee Contract of employment Training provider Internal records	Contractual Obligations Legal Obligations	6 years after having left employment	12 months	Claims can be brought up to 6 years after the end of employment, so this information may be needed in defence of a claim.	Delete
References	Hard drive, HR Management System (People HR)	Previous employers on behalf of employee	Legal Obligations	6 years after having left employment	12 months	Claims can be brought up to 6 years after the end of employment, so this information may be needed in defence of a claim.	Delete

Date Policy Last Updated: May 2018