



# PRIVACY POLICY

## SCHEDULE 5

### Retention and deletion

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Unless we are required or permitted by law to hold on to your information for a specific retention period, we may retain your information for the following purposes and periods:

Category of personal data	Period for which personal data will be stored
<ul style="list-style-type: none"><li>• Data about our clients, business contacts, and third parties involved in matters in relation to which we provide services to our clients.</li></ul>	<p><b>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing our services:</b></p> <p>Such information will be stored for up to 7 years following completion of the services or termination or expiry of the contract with our client (whichever is later).</p> <p><b>Contact details for marketing purposes:</b></p> <p>Contact information relating to clients and contacts will be held for so long as we believe the information to remain accurate and the individual concerned remains a genuine connection of ours, or of one of our directors and staff. We have a programme for reviewing our contacts regularly and removing any information which is considered to be out of date or no longer relevant.</p>
<ul style="list-style-type: none"><li>• Data about our suppliers and supplier personnel.</li></ul>	<p><b>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing your services:</b></p> <p>Such information will be stored for up to 7 years following completion of the services or termination or expiry of your contract (whichever is later).</p>
<ul style="list-style-type: none"><li>• Data about individuals who apply for employment or work experience with us.</li></ul>	<p>Personal data obtained from employment or work experience applicants will be deleted after 12 months.</p>
<ul style="list-style-type: none"><li>• Data about our directors and staff, former directors and staff and other individuals who spend time with us (such as consultants).</li></ul>	<p>Human resources (HR) records will be destroyed 7 years following employment. For the purposes of administration this will be actioned annually in December of each year.</p> <p>Personal data stored in private workspaces created for members of HR (including for appraisals, promotion and probation reviews) will be deleted 15 months after creation.</p>
<ul style="list-style-type: none"><li>• CCTV</li></ul>	<p>CCTV information is destroyed after 30 days.</p>

Updated: 12 November 2021