



# JAMIE BRIGGS REMOVALS & STORAGE LIMITED

## **Data Retention Policy**

### **Purpose**

The purpose of this policy is to specify the Company's guidelines for retaining different types of data.

### **Scope**

The scope of this policy covers all Company data stored on Company owned, leased and otherwise Company provided systems and media regardless of location whether analogue or digital.

Please note that the need to retain certain information can be mandated by local industry regulations and will comply with EU GDPR Data Protection Act and the Data Protection Amendment Act 2003.

### **Reasons for Data Retention**

The company does not wish to adopt a "save everything" process. This is neither practical nor cost effective. Some data however, must be retained in order to protect the Company's interests, preserve evidence and generally conform to good practice.

Some reasons for data retention may involve:

- Accident Investigation
- Claim Investigation
- Security Investigation
- Regulatory requirements

### **Where is our data stored?**

Jamie Briggs Removals and Storage data is stored on the Company server and external USB drive with encrypted cloud backup. Some data is stored on PCs which are password protected.

### **Retention requirements**

This section sets guidelines for retaining the different types of Company Data.

- Personal Customer Data – this will be retained for 7 years as this is the time limit for a claim to be made via the British Association of Removers (BAR).
- Personal Employee Data – general Employee data will be held for the duration of employment and then for 6 years after the last day of contractual employment. Employee contracts will be held for 6 years after the last day of contractual employment.
- Tax payments – will be held for 6 years
- Recruitment Details – interview notes of unsuccessful applicants will be held for 1 year after interview. This personal data will then be shredded.

- Health and Safety – 7 years for major accidents, dangerous occurrences and near misses.
- Operational Data – most Company data will fall into this category and will be retained for 6 years post the client’s contract being signed.
- Critical Data including Tax and V.A.T – will be retained for 6 years
- Confidential Data – must be retained for 7 years

### **Retention of Encrypted Data**

If any information retained under this policy is stored in encrypted format, consideration must be taken for secure storage of the encryption keys. Encryption keys must be retained for as long as the data keys described is retained.

### **Data Destruction**

Data destruction is a critical component of a data retention policy. When the retention time frame expires, the senior management team must actively destroy the data by shredding or by anonymising the information from the in-house software package, MoveMan.

If a user feels that certain data should not be destroyed, he or she should identify the data to the senior management team so that an exception policy can be considered.

The Company specifically directs users not to destroy data in violation of this policy. Destroying data that a user may feel is harmful to himself or herself is particularly forbidden as is destroying data in an attempt to cover-up a violation of law or Company policy.

### **Enforcement**

This policy will be enforced and reviewed by the Senior Management team of Jamie Briggs Removals and Storage Ltd on an annual basis.

Julie Briggs – May 2018