



Data Retention Policy

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1. Purpose, Scope and Users

This policy sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information within Sporting Chance Newport CIC (further: the “Company”).

This Policy applies to all business units, processes and systems in which the Company conducts business and has dealings or other business relationships with third parties.

This Policy applies to all Company officers, directors, employees, agents, affiliates, contractors, consultants, advisors or service providers that may collect, process, or have access to data (including personal data and / or sensitive personal data). It is the responsibility of all of the above to familiarise themselves with this Policy and ensure adequate compliance with it.

This policy applies to all information used at the Company. Examples of documents include:

- Emails
- Physical Documents
- Digital Documents
- Video and audio

2. Reference Documents

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
- Personal Data Protection Policy

3. Retention Rules

3.1. Retention General Principle

In the event, for any category of documents not specifically defined elsewhere in this Policy (and in particular within the Data Retention Schedule) and unless otherwise mandated differently by applicable law, the required retention period for such document will be deemed to be 3 years from the date of creation of the document.

3.2. Retention General Schedule

The Data Protection Officer defines the time period for which the documents and electronic records should be retained through the Data Retention Schedule.

As an exemption, retention periods within Data Retention Schedule can be prolonged in cases such as:

- Ongoing investigations from authorities, if there is a chance records of personal data are needed by the Company to prove compliance with any legal requirements; or
- When exercising legal rights in cases of lawsuits or similar court proceedings recognized under local law.

3.3. Safeguarding of Data during Retention Period

The possibility that data media used for archiving will wear out shall be considered. If electronic storage media are chosen, any procedures and systems ensuring that the information can be accessed during the retention period (both with respect to the information carrier and the readability of formats) shall also be stored in order to safeguard the information against loss as a result of future technological changes. The responsibility for the storage falls to the Data Protection Officer.

3.5. Breach, Enforcement and Compliance

The Data Protection Officer has the responsibility to ensure that the Company complies with this Policy. It is also the responsibility of the Data Protection Officer to assist with enquiries from any local data protection or governmental authority.

Any suspicion of a breach of this Policy must be reported immediately to Data Protection Officer. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage to the Company's reputation, personal injury, harm or loss. Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to Company premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

4. Document Disposal

3.1. Retention General Principle

Records which may be routinely destroyed unless subject to an on-going legal or regulatory inquiry are as follows:

- Announcements and notices of day-to-day meetings and other events including acceptances and apologies;
- Requests for ordinary information such as travel directions;
- Reservations for internal meetings without charges / external costs;
- Transmission documents such as letters, fax cover sheets, e-mail messages, routing slips, compliments slips and similar items that accompany documents but do not add any value;
- Message slips;
- Superseded address list, distribution lists etc.;
- Duplicate documents such as CC and FYI copies, unaltered drafts, snapshot printouts or extracts from databases and day files;
- Stock in-house publications which are obsolete or superseded; and
- Trade magazines, vendor catalogues, flyers and newsletters from vendors or other external organizations.

In all cases, disposal is subject to any disclosure requirements which may exist in the context of litigation.

Any physical documents will be shredded, and electronic versions will be securely deleted. All other documents will be disposed of as appropriate.

5. Managing Records Kept on the Basis of this Document

Record Name	Storage location	Person responsible for storage	Controls for record protection	Retention time
Data Retention Schedule	Data Protection Officer's OneDrive	Data Protection Officer	Only authorised persons may access this document	Permanently

6. Validity and Document Management

This document is valid and reviewed as of September 2021

The owner of this document is the Data Protection Officer who must check and, if necessary, update the document at least once a year.

7. Appendix – Data Retention Schedule

Financial Records

Personal data record category	Mandated retention period	Record owner
Payroll records	7 years after audit	Finance
Supplier contracts	7 years after contract is terminated	Finance
Chart of Account	Permanent	Finance
Policies and Procedures	Permanent	Finance
Permanent Audits	Permanent	Finance
Financial statements	Permanent	Finance
General Ledger	Permanent	Finance
Investment records (deposits, earnings, withdrawals)	7 years	Finance
Invoices	7 years	Finance
Cancelled checks	7 years	Finance
Bank deposit slips	7 years	Finance
Business expenses documents	7 years	Finance
Check registers/books	7 years	Finance
Property/asset inventories	7 years	Finance
Credit card receipts	3 years	Finance
Petty cash receipts/documents	3 years	Finance

Business Records

Personal data record category	Mandated retention period	Record owner
Board policies	Permanent	Directors
Board meeting minutes	Permanent	Directors
Tax or employee identification number designation	Permanent	Directors
Office and team meeting minutes	Permanent	Directors

HR: Employee Records

Personal data record category	Mandated retention period	Record owner
Disciplinary, grievance proceedings records, oral/verbal, written, final warnings, appeals	As per legal requirement	HR
Applications for jobs, interview notes – Recruitment/promotion panel Internal Where the candidate is unsuccessful Where the candidate is successful	Deleted immediately Duration of employment	Directors/management
Payroll input forms, wages/salary records, overtime/bonus payments Payroll sheets, copies	7 years	HR
Bank details – current	Duration of employment	HR
Payrolls/wages	Duration of employment	HR
Job history including staff personal records: contract(s), Ts & Cs; previous service dates; pay and pension history, pension estimates, resignation/termination letters	As per legal requirement	HR
Expense claims	As per legal requirement	HR
Annual leave records	Duration of employment	HR
Accident books Accident reports and correspondence	As per legal requirements	HR
Certificates and self-certificates unrelated to workplace injury; statutory sick pay forms	As per legal requirements	HR
Parental leave	Duration of employment	HR
Maternity pay records and calculations	As per legal requirements	HR
Redundancy details, payment calculations, refunds, notifications	As per legal requirements	HR
Training and development records	Duration of employment	HR

Contracts

Personal data record category	Mandated retention period	Record owner
Signed	Permanent	Finance
Contract amendments	Permanent	Finance
Successful tender documents	Permanent	Finance
Unsuccessful tender documents	Permanent	Finance
Tender – user requirements, specification, evaluation criteria, invitation	Permanent	Finance
Contractors' reports	Permanent	Finance
Operation and monitoring, e.g. complaints	Permanent	Finance

Client/Customer and Non-Client/Customer Data

Personal data record category	Mandated retention period	Record owner
Platform data – inclusive of Video data, comments, attachments, profile picture, email address, first and second name	Retained whilst organisation remains a client/customer or deleted by user. Once an organisation request all records to be deleted, data will be removed from the back-ups within 9 months	Directors/Client/Customer
Name, email address in marketing databases	Kept until person unsubscribes / requests to be removed from our records	Directors/Client/Customer

IT

Personal data record category	Mandated retention period	Record owner
Recycle Bins	Cleared monthly	Individual employee
Downloads	Cleared monthly	Individual employee
Inbox	All emails deleted after 3 years	Individual employee
Deleted Emails	Cleared monthly	Individual employee
Local Drives & Files	Moved to OneDrive weekly, then deleted from local drive	Individual employee
OneDrive	Reviewed monthly	Individual employee



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