

## **Property Partners Data Retention Policy**

Welcome to the data retention policy of Property Partners Limited, referred to as Property Partners for the purposes of this policy.

Having completed an audit of the data held by Property Partners, the Data Protection Act 2018 requires us to have in place a data retention policy that clearly defines how long we will hold 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 Jonathan Naughton, 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 a court case in process or expected where the data will form part of the evidence in the case). In such circumstances the requirements of the court case will override the policies outlined below.

Property Partners is committed to enforcing this policy as it applies to all forms of data. If you feel that you or someone else may have violated this policy, you should report the incident immediately to Jonathan Naughton.

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 for the personal data has expired.

**Employees/Job Applicants**

Type of Data Held	Location of Data	Source of Data	Reason for Data Being Held	Retention Period	Reason for Retention Period	Delete/Anonymise
Full Name	Electronic media and / or physical files	Employee as part of fair processing notice	To ensure all employee records are accurate.	6 years after having left employment	Employment 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
Date of birth	Electronic media and / or physical files	Employee as part of fair processing notice	To ensure all employee records are accurate.	6 years after having left employment		Delete
Full address	Electronic media and / or physical files	Employee as part of fair processing notice	To ensure all employee records are accurate.	6 years after having left employment		Delete
Previous addresses	Electronic media and / or physical files	Employee as part of fair processing notice	To ensure all employee records are accurate.	6 months after record is updated.	The information may be needed for a short period after it has been changed to confirm previous address history.	Delete
Medical information (i.e. information relating to disabilities or medical information that may be needed).	Electronic media and / or physical files	Employee	To enable the company to comply with its legal obligations in terms of equality and anti-discrimination and to also ensure the firm does its best to protect the health and wellbeing of its employees.	Upon leaving employment unless the data needs to be retained for the purposes of reporting or compliance with our legal obligations, in which case it will be retained for 6 years after	These records are classed as sensitive personal data, there is no need for the company to have any information relating to an employee's medical history	Delete

				leaving employment.	after they leave employment unless it needs to be retained in accordance with our legal obligations, including under the Equality Act 2010	
Contract of employment	Electronic media and / or physical files	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	Employment 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
Disciplinary history	Electronic media and / or physical files	Internal records kept with HR	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.	Many disciplinary notes expire after a set period and, as such, must be removed from the record upon expiry. Some, however, will need to be kept on the record as evidence in the event of an employment tribunal claim or court case.	Delete
CVs	Electronic media and / or physical files	Employee and/or recruitment agency	To enable the assessment of candidates for jobs.	12 months after unsuccessful application	This information should be retained to ensure the same person is not interviewed more than once and to	Delete

					also evidence, if required, compliance with equality laws.	
Criminal records	Electronic media and / or physical files	Employee and/or background checking service	To ensure that employees are not prohibited from undertaking certain activities and to ensure the Company is not putting employees or third parties at risk.	Upon the expiry of the criminal record or 6 months after termination of employment, whichever is sooner.	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	Electronic media and / or physical files	Background checking service.	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.	Unless required to be kept by a code of practice or regulator, such records should be deleted upon the employee passing their probation period.	Once an applicant becomes an employee and has 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

**Customers**

Type of Data Held	Location of Data	Source of Data	Reason for Data Being Held	Retention Period	Reason for Retention Period	Delete/Anonymise
Full name of key contacts at customers	Electronic media and / or physical files	Customer	To enable us to perform our contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Email addresses of key contacts at customers	Electronic media and / or physical files	Customer	To enable us to perform our contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Address details of customers	Electronic media and / or physical files	Customer	To enable us to perform our contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Financial information	Electronic media and / or physical files	Customer	To reconcile payments received from customers and to enable payments to customers if required	Upon notification from customer that details are no longer accurate or 10 years after termination of contract, whichever is sooner	For follow-up contact & audit	Delete

**Suppliers**

Type of Data Held	Location of Data	Source of Data	Reason for Data Being Held	Retention Period	Reason for Retention Period	Delete/Anonymise
Full name of key contacts at suppliers	Electronic media and / or physical files	Supplier	To enable us to monitor performance of supplier's contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Email addresses of key contacts at suppliers	Electronic media and / or physical files	Supplier	To enable us to monitor performance of supplier's contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Address details of suppliers	Electronic media and / or physical files	Supplier	To enable us to monitor performance of supplier's contractual services	10 years after termination of contract	For follow-up contact & audit	Anonymise
Financial information	Electronic media and / or physical files	Supplier	To enable us to pay suppliers for work performed	Upon notification from supplier that details are no longer accurate or 10 years after termination of contract, whichever is sooner	For follow-up contact & audit	Delete

**Marketing/Prospects**

Type of Data Held	Location of Data	Source of Data	Reason for Data Being Held	Retention Period	Reason for Retention Period	Delete/Anonymise
Full name of prospects	Electronic media and / or physical files	Various – including prospects themselves, third parties, internet searches and external databases	To enable us to market to potential customers	10 years or upon request from subject for data to be deleted, whichever is soonest	For follow-up contact	Delete
Email address of prospects	Electronic media and / or physical files	Various – including prospects themselves, third parties, internet searches and external databases	To enable us to market to potential customers	10 years or upon request from subject for data to be deleted, whichever is soonest	For follow-up contact	Delete
Full address of prospects	Electronic media and / or physical files	Various – including prospects themselves, third parties, internet searches and external databases	To enable us to market to potential customers	10 years or upon request from subject for data to be deleted, whichever is soonest	For follow-up contact	Delete
Preferences of prospects	Electronic media and / or physical files	Prospects' own interactions with our website and marketing materials	To enable us to monitor interaction with marketing to ensure that it is targeted appropriately	10 years or upon request from subject for data to be deleted, whichever is soonest	For follow-up contact	Anonymise

**Date Policy Last Updated: 3<sup>rd</sup> August 2018**