



Data Protection

Data Retention Policy

Overview

The purpose of this policy is to provide a framework which will govern decisions over whether particular data or documents should be retained or disposed of.

Where documents are retained it provides a framework for the appropriate retention period and format.

Personal data is important throughout the different areas of our organisation. It is used by us amongst other things, to meet our strategic objectives, comply with our legal obligations and meet our contractual obligations towards our visitors, guests, customers, employees, contractors, suppliers and others.

As such, all personal data should be safeguarded and held securely in accordance with our data protection policies and procedures including our IT policy.

Personal information shall be kept accurate and retained for no longer than is necessary to meet the purpose for which it is held.

Personal data is stored in a number of ways including through our personnel system, marketing lists and client databases. It is kept in electronic and/or hard copy form.

Employees should be aware that whenever they access our systems, they may be accessing personal data and should therefore comply with our data protection policies and procedures including our IT policy at all times.

Retention Principles

Personal data will only be kept for as long as necessary or until there is no longer a good reason to do so. We may in appropriate cases pseudonymise personal data or anonymise it.

The attached Document Retention Schedule details the length of time particular personal data will be retained for or the criteria we use for determining that and at what points it will be archived and destroyed or the criteria we use to determine that.



Review

In all circumstances personal information held will be periodically reviewed to ensure that it remains accurate and adequate for the purposes for which it is retained and that the purpose for processing the data has not changed.

Individual Rights

Should an individual ask for their personal information to be removed or corrected, requests will be dealt with promptly and in accordance with data protection laws.

Should the purpose of processing the data change and a new retention period apply, a revised privacy notice will become available.

What will happen to your information?

When the retention period for your personal information reaches an end then we will take the following actions – in accordance with our Disposal of Storage Media Policy:

- Paper records will be securely shredded
- Electronic records will be securely deleted

Queries

If you have any queries about what is required of you under this Policy please speak to Shane Guy, Head of Tourism.

Document Ownership

The Data Protection Officer is the owner of this policy document and will ensure that it is periodically reviewed and updated as required.

The latest version of this policy is dated at the bottom of the document.



Document Retention Schedule

Employee Data

As a general rule we will keep employee data for so long as it is necessary to manage, administer and perform the employment relationship.

Where an employee leaves our employment we will keep data as a general rule for 7 years. We are required by law to keep certain statutory records (for example relating to health and safety issues) for longer periods.

We may retain employee data for longer periods where there is a good reason to do in accordance with our General Criteria below.

Job Applicant Data

As a general rule we will keep job applicant data for so long as it is necessary to manage, administer and perform the applicable recruitment process.

Where an applicant does not become an employee we will normally keep their data for a period of 6 months.

We may retain employee data for longer periods where there is a good reason to do in accordance with our General Criteria below.

Legal and Contractual Data

As a general rule we will keep data relating to our contractual and legal relationships and dealings with our customers, visitors, suppliers and contractors for a period of 7 years after that relationship has come to an end unless there is a good reason under our General Criteria to apply a different period.

Financial, Tax and Accounting Data

As a general rule we will keep data relating to our financial, taxation and accounting obligations and requirement for a period of 7 years after that relationship has come to an end unless there is a good reason under our General Criteria to apply a different period.



CCTV Data

As a general rule we will keep CCTV data for a period of 30 days unless there is a good reason under our General Criteria to apply a different period.

General Criteria

We may apply different retention periods where it is appropriate and proportionate under data protection laws to do so.

As examples this could include situations where:

- There is an ongoing legal requirement to retain data;
- There is an ongoing contractual requirement to retain data;
- There is an ongoing request under UK data protection laws in respect of the data;
- We have determined that it is appropriate and proportionate to delete the data earlier than the above retention periods;
- We are deleting the data sooner in accordance with a request under data protection laws.