

## RECORD RETENTION AND PROTECTION POLICY FOR CUSTOMERS OF MEGAFLATABLES LIMITED

### **1 Introduction**

Megaflatables Limited (“the Company”) collects and processes a great deal of data in order to conduct everyday operations.

When it comes to retaining and protecting data relating to individuals there are some key legal requirements with which the Company needs to comply. The purpose of this statement is to set out how the Company meets these requirements and to ensure that every individual who provides data to the Company understands how data is stored, how it is protected and for how long it is retained.

This policy should be viewed alongside the:

- Privacy Statement
- Data Breach Notification Procedure

The Record Retention and Protection Policy is one element of how the Company fulfils the obligations under the General Data Protection Regulation 2016 (“GDPR”).

### **2 General Principles**

The Company has some clear requirements when it comes to the protection and retention of personal data. These are:

- The Company must retain the data that is needed in order to comply with legal, regulatory and contractual requirements.
- The Company must not hold data for longer than is necessary.
- The Company must ensure that only people who have a genuine need to see the data are able to access it.
- The Company must protect the data held so as to ensure it remains confidential and that the treatment of the data does not breach the privacy rights of individuals.
- The Company must be able to retrieve data in line with business requirements and in line with the requirements of the Data Subject Access Request Procedure.

### **3 Record Types and Guidelines**

On the following page you will find details of the Company’s approach to record retention and protection in relation to the data held.



<b>Data Item</b>	<b>How is the data stored?</b>	<b>How is the data protected?</b>	<b>How long is the data kept?</b>	<b>Reason for retention period</b>
Name and Address	Office365. Paper forms held in a locked cupboard.	Office365 Username and Password. Cupboard locked with limited access.	Indefinitely.	We will always need to have a history of our clients.
Credit card details	It's not. Note destroyed immediately.	The note is shredded as soon as the transaction has been processed.	We won't	Not applicable
Telephone number	Office365. Paper forms held in a locked cupboard.	Office365 Username and Password. Cupboard locked with limited access.	Indefinitely.	We will always need to have a history of our clients.
Email	Bespoke workflow system on protected network.	Office365 Username and Password. Cupboard locked with limited access.	Indefinitely.	We will always need to have a history of our clients.

#### **4 Record Destruction**

Once records have reached the end of their life in accordance with the Record Retention Policy, the Company will securely destroy them. Paper records will be shredded and electronic records will be deleted from all medium (servers, hard drives, cloud based systems etc.).

#### **5 Record Review**

The Company will review the approach taken to record retention and protection on a regular basis with the aim of the review being to:

- Ensure that the retention periods continue to balance the Company's legal obligations with the rights of data subjects.
- That the Company is adhering to the agreed approach to record retention and destruction.
- That the way in which data is stored allows it to be retrieved in a timely fashion.

#### **6 Concerns and Questions**

GDPR is new legislation and how the rules are interpreted will continue to evolve. The Company will continue to adopt best endeavours to ensure on-going compliance but any individual who has concerns regarding any of the actions that are being taken or feels that they are unclear as to how the Company is complying with elements of the legislation should raise their concerns with the Operations Manager. Your concerns will be investigated and responded to within 28 days.