

Cognisco Ltd

## Retention of Records Procedure

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Author:	A Ellis
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## Scope

Any personal data records held by Cognisco Ltd, electronic or paper based form part of the retention of records procedure as per the requirements of the GDPR.

## Responsibilities

The (Data Protection Officer / GDPR Owner) is accountable for all personal data collected ensuring it is securely stored, maintained and destroyed in line with the requirements of the GDPR.

The table below details areas of responsibility for retention of records

<b>Type of Data</b>	<b>Responsible for</b>
Financial, Accounting and Tax	The Finance Director (CFO)
Statutory and Regulatory Records	The Company Secretary
HR Records	The Head of HR
Health and Safety Records	The Health and Safety Officer
Business Continuity and Disaster Recovery Plans	The Governance Manager

## Procedure Statement

Retention periods for all personal data records are listed below. Each set of data records are stored and retained as per Legal Governing Body requirements.

<b>Types of Records</b>	<b>Retention Period</b>	<b>Storage Media</b>	<b>Other Information</b>	<b>Governing Body</b>	<b>Security of Record</b>
<i>e.g HR Files</i>	<i>6 years 5 years in Scotland</i>	<i>Secure Filing Cabinet</i>	<i>Also stored online in HR database</i>	<i>CIPD</i>	<i>Part of the daily back up routine</i>
<i>e.g Financial VAT Records</i>	<i>6 years</i>	<i>Sage Accounts</i>	<i>N/A</i>	<i>HMRC</i>	<i>Part of the daily back up routine and FDs secure cabinet</i>

The IT Service Manager is responsible for ensuring that where use of electronic storage media is used that it does not exceed 90% of the manufacturer's recommended life. A schedule is created by The IT Service Manager to identify a schedule that each of the storage media in use, the recommended life is with cross-reference to the table above. When the storage media reaches 90% of expected life, The IT Service Manager duplicates the stored data onto new storage media.

When data stored exceeds its data retention period, The IT Service Manager is responsible for destroying data within 30 days. Cognisco Ltd destruction process [insert details of how, by whom, type of record and how it is to be destroyed]

Portable/removable storage media are destroyed in line with the company data protection and storage media procedure.

## Document Management

This document is valid as of January 2018.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- General Data Protection Regulation
- Legislative requirements defined by law, where appropriate

(Role)

(Author)

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(Signature)