

Urban Futures Data Retention Policy

Welcome to the data retention policy of the Urban Futures Limited Liability Partnership, referred to as Urban Futures for the purposes of this policy.

Having completed an audit of the data held by Urban Futures, 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.

Urban Futures 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 |

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|------------------------|--|------------------------------------|--|---|--|--------|
| | | | | 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 |

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| | | | | | 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: 3rd August 2018