

## **SERPLY RECRUITMENT LTD**

### **DATA RETENTION POLICY**

#### **1. PURPOSE**

The purpose of this Policy is to ensure that records and documents of **Serply Recruitment Ltd** (“the Company”) are:

- Adequately protected
- Securely maintained
- Retained only for as long as necessary
- Appropriately disposed of when no longer required

This Policy applies to all physical and electronic records, including emails, databases, documents, and all digital file formats.

This Policy supports compliance with:

- UK GDPR
- Data Protection Act 2018
- All other applicable data protection and privacy legislation

#### **2. POLICY STATEMENT**

The Company will retain records only for as long as necessary to fulfil:

- Legal obligations
- Contractual requirements
- Legitimate business purposes

All records will be disposed of securely and confidentially when retention periods expire.

The Company adheres to the following data protection principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality

#### **3. LAWFUL BASIS FOR PROCESSING**

Personal data will only be processed where a lawful basis applies, including:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests

Processing will always be carried out in a fair, transparent, and proportionate manner.

#### **4. DATA SUBJECT RIGHTS**

Individuals have the following rights under data protection legislation:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability

All requests will be handled in accordance with applicable legislation and within required timeframes.

#### **5. RETENTION PRINCIPLES**

Retention periods are determined based on:

- Legal and regulatory requirements
- Limitation periods for legal claims
- Business and operational needs

The Company will not retain personal data longer than necessary.

Where appropriate, data will be anonymised or securely deleted.

#### **6. ADMINISTRATION**

Appendix A sets out the Record Retention Schedule.

The Company will:

- Review this Policy and retention schedule annually
- Monitor legislative and regulatory changes

- Ensure staff awareness of data retention responsibilities
- Audit compliance with this Policy

Personal data may only be used for the purpose for which it was originally collected unless further processing is lawful.

## **7. SUSPENSION OF DELETION (LEGAL HOLD)**

Data must be retained beyond standard periods where:

- Legal proceedings or investigations are ongoing or anticipated
- Required by statutory obligation
- Necessary to defend or establish legal claims
- Required for regulatory review or enforcement

Where a legal hold applies, deletion must be suspended immediately.

## **8. SECURITY OF PERSONAL DATA**

The Company will implement appropriate technical and organisational measures to protect personal data, including:

- Secure systems with restricted access
- Password protection and user authentication
- Encryption where appropriate
- Secure storage and backup procedures

Users are responsible for maintaining the confidentiality of login credentials.

## **9. DATA BREACH MANAGEMENT**

Any personal data breach must be reported immediately.

The Company will:

- Investigate all breaches promptly
- Assess risk to individuals
- Notify the Information Commissioner's Office (ICO) where required
- Notify affected individuals where legally necessary

## **10. ELECTRONIC DATA AND EMAIL MANAGEMENT**

- Routine emails will be deleted after 12 months unless required for legal, contractual, or operational purposes
- Archived emails may be deleted after 90 days unless subject to retention requirements
- Key communications relating to clients, candidates, or assignments will be retained in the Company's systems in line with the relevant retention period
- Where both electronic and paper records exist, the electronic version shall be treated as the primary record

## **11. RECRUITMENT AND CANDIDATE DATA**

Candidate and client data will be retained where there is a legitimate business interest, including:

- Ongoing recruitment activity
- Future placement opportunities

Such data will be:

- Reviewed periodically
- Retained only where relevant and appropriate
- Deleted where no longer required

Consent will be obtained where required by law.

## **12. APPLICABILITY**

This Policy applies to:

- All employees
- All contractors and consultants
- All records created, received, or maintained by the Company

## **13. AMENDMENTS AND REVIEW**

This Policy will be:

- Reviewed annually
- Updated in line with legal and operational changes

The latest version will be made available internally and for audit or compliance purposes where required.

## **APPENDIX A – RECORD RETENTION SCHEDULE**

*(Retention periods represent minimum standards and may be extended where legally required or where necessary to protect the Company's interests.)*

## **A. ACCOUNTING AND FINANCE**

<b>Record Type</b>	<b>Retention Period</b>
Annual audit reports and financial statements	Permanent
Audit work papers and supporting documents	7 years
Budgets and financial records	7 years
Bank statements	7 years

## **B. CONTRACTS**

Contracts and related documentation

 **7 years after termination**

## **C. CORPORATE RECORDS**

<b>Record Type</b>	<b>Retention</b>
Board minutes, registers	Permanent
Licences and permits	Current + 7 years

## **D. CORRESPONDENCE**

- Routine: 5 years
- Non-routine: aligned to project or permanent

## **E. PERSONAL DATA**

<b>Record Type</b>	<b>Retention</b>
Candidate / client records	2 years after last contact (subject to review)
Placement records	6 years
Agency worker records	6 years
Right to work documents	2 years after employment ends

<b>Record Type</b>	<b>Retention</b>
Marketing data	Until consent withdrawn
Consent records	Reviewed periodically

## **F. EMAIL AND ELECTRONIC FILES**

- Routine emails: 12 months
- Archived emails: 90 days (unless required)
- CRM records: aligned to assignment

## **G. INSURANCE**

### **Record Type Retention**

Policies	7 years
Claims	7 years minimum (longer if required)

## **H. LEGAL FILES**

### **Record Type Retention**

Litigation files	7 years
Court orders	Permanent

## **I. PERSONNEL RECORDS**

### **Record Type Retention**

Employee files	6 years
Contracts	6 years
Recruitment records	1 year

## **J. TAX RECORDS**

### **Record Type Retention**

VAT and tax records	7 years
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<b>Record Type</b>	<b>Retention</b>
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Payroll records	6 years
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