DATA RETENTION POLICY WITH SCHEDULE of THE SALES DOCTOR

Introduction

As part of the day-to-day running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is stored both as a hard copy and in electronic form.

Aims of the policy

Our business will ensure that the personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods or/and services – as required by data protection legislation, including the General Data Protection Regulation (GDPR).

Retention

This retention policy (along with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

Decisions around retention and disposal are to be taken in accordance with this policy.

As and when the retention period for a specific document has expired, a review is always to be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration is to be given to the method of disposal.

Responsibility

Ray King is responsible for keeping this retention schedule up to date in order to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business.

Ray King is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

Disposal

Our business must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- · Transmission of records to an external body
- Cloud storage

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Date created: 27th August 2024

Date of review: N/A

Appendix 1: Document retention schedule

Commercial contracts:

| Type of record | Retention period | Where is it | Reason | Method of |
|--------------------------|--------------------|--------------|-----------------|------------|
| | | stored? | | deletion |
| Contracts with suppliers | 6 years after last | Online Cloud | Supply contract | Online & |
| | action | & Local | | Local |
| | | Electronic | | electronic |
| | | Storage | | deletion |
| Purchase orders and | 7 years after last | Online Cloud | Supply payment | Online & |
| invoices | action | & Local | information | Local |
| | | Electronic | | electronic |
| | | Storage | | deletion |

Marketing records:

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|----------------|--------------------------|---|----------------------|---|
| Mailing lists | 1 year after last action | Online and Local storage, Customer Relationship Manager Software | To assist with audit | Online & Local electronic deletion |

Accounting Records:

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|-----------------------------------|---------------------------------|-------------------------|----------------------|---------------------|
| Accounting & financial management | 6 years from end of fiscal year | Online Cloud & Local | To assist with audit | Online & Local |
| information | j | Electronic Storage | | electronic deletion |

Operational records:

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|---------------------|---------------------------------|--|----------------------------|---|
| Policies/Procedures | 7 years | Online Cloud & Local Electronic Storage | To comply with regulations | Online & Local electronic deletion |
| Complaints | 6 years from end of fiscal year | Online Cloud & Local Electronic Storage | To assist with audit | Online & Local electronic deletion |
| Insurance schedules | 10 years after last action | Online Cloud & Local Electronic Storage | To assist with audit | Online & Local electronic deletion |

Intellectual property records:

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|--------------------|----------------------|---------------------|----------------|--------------------|
| Copyright material | 50 years from expiry | Online Cloud | To assist with | Online & |
| | | & Local | audit | Local |
| | | Electronic | | electronic |
| | | Storage | | deletion |

Email records:

| Type of record | Retention period | Where is it stored? | Reason | Method of deletion |
|----------------------|--------------------------------|--|---|--|
| Email correspondence | Archive emails after 12 months | Microsoft Outlook. Online Cloud & Local Electronic Storage and | To assist with any subsequent communication | Archive through Microsoft Outlook |
| | | Customer Relationship Manager Software | | |