



Data Retention and Erasure Policy & Schedule

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Introduction

Data Retention Approach

The purpose of this policy is to ensure that necessary data, records and documents of Pleasure Girls are adequately protected and maintained. Also, to ensure that records that are no longer needed or are of no value are discarded at the proper time and manor. This policy is also for the purpose of aiding employees of Pleasure Girls in understanding their obligations in retaining data or electronic documents including email, instant messages, web files, text files, sound and video files, PDF documents and all Microsoft Office or other formatted files.

In summary, personal data will be retained for no longer than is absolutely necessary. A Data Retention Schedule will be produced by Pleasure Girls to demonstrate a generic retention period based on the purpose of the data and data retention guidelines. In the event that the retention of personal data is no longer necessary for the operation of Pleasure Girls, the data shall be deleted and all copies shall be destroyed as per the defined schedule.

Administration

The following Record Retention Schedule is the initial maintenance, retention and disposal schedule for records held by Pleasure Girls. This schedule should be reviewed regularly to ensure the data retention policy approach is adhered to.

There are certain occasions when information needs to be preserved beyond any limits set out in the policy. The policy must be SUSPENDED relating to a specific customer or document and the information retained beyond the period specified in this Data Retention Schedule in the following circumstances:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened or actual
- A crime is suspected or detected
- Information is relevant to a company in liquidation, receivership or where a debt is due to the company
- Information is considered by the owning unit to be of potential historical importance

In the case of possible or actual legal proceedings, investigations or crimes occurring, the type of information that needs to be retained relates to any that will help or harm the company or the other side's case, liability or amount involved. If there is any doubt over whether legal proceedings, an investigation or a crime could occur or what information material is relevant in these circumstances, the company shall take such steps as is necessary to promptly inform all staff of any suspension in the

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further disposal of documents.

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Record Retention Schedule

The data retention policy is based on the following schedule.

Department	Function
A	Accounting and finance
B	Contracts
C	Corporate records
D	Correspondence and internal memoranda
E	Personal information
F	Electronic records
G	Insurance records
H	Legal
I	Miscellaneous
J	Personnel records
K	Tax records

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A. Accounting and Finance

Record Type	Retention Period
Annual accounts and financial information	Permanent
Bank statements and cancelled cheques	7 years
Interim financial statements	7 years

All records showing customer bank details must be locked in a desk drawer or a filing cabinet when not in immediate use by employees. If it is determined that information on a document, which contains credit card information, is to be retained beyond 3 months then the identifying details will be cut out of the document.

B. Contracts

Record type	Retention Period
Contracts and related correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

C. Corporate Records

Record type	Retention Period
Corporate records (record of incorporation, articles of incorporation, annual corporate reports)	Permanent
Licenses and permits	Permanent

D. Correspondence and Internal Memoranda

General principle: most correspondence and internal memoranda should be retained for the same period as the document to which they relate. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

Category 1

Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years. Some examples include:

- General enquiries and replies
- Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change)
- Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary
- Chronological correspondence files

Copies of documents where a copy will be in the originating department file should be read and destroyed; unless that information provides reference to, or direction to other documents and must be kept for project traceability.

Category 2

Those pertaining to non-routine matters or having significant lasting consequences should generally be permanently retained.

E. Retaining Personal Information

This section sets out the data retention policies and procedures that are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information.

Personal information that is processed for any purpose(s) shall not be kept for longer than is necessary for that purpose or those purposes. We will usually delete personal data falling within the categories set out below at a maximum of the date/time set out below:

Record type	Retention period
Information about a computer, including visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	2 years following information submission
As a client, any information provided when contacting us via our website, website booking form, contact us page, email, mobile, IM, social media or by any other means. This may include sensitive personal information.	1 month following information submission
As a member of our gallery, any information provided when completing a recruitment profile on our website, by email, phone, IM, social media, or any other means (including a name, gender, age, services offered professional experience and nationality). This may include sensitive personal information.	2 years following account closure or our last interaction.
Information relating to any enquiries made (including name, address, telephone number, email address and payment details)	2 years following information submission
Information or media submitted to our website for publication on the internet	2 years after submission
Information contained in or relating to any communications sent through the website (including the communication content and metadata associated with the communication)	2 years following contact
Any other personal information chosen to be sent	2 years following contact

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Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing personal data:

- To the extent that we are required to do so by law;
- If we believe that the documents may be relevant to any ongoing or prospective legal proceedings;
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)

We will run database backups of all electronic data contained on our servers. This backup will include all information relating to all current users, as well as any information that remains on the server due to any reason contained in this policy. This database backup is a safeguard to retrieve lost information within a one year retrieval period should system users experience any problems.

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F. Electronic Documents

Electronic Mail

Not all email needs to be retained, it depends on the subject matter.

- All emails from clients are to be deleted after 12 months regardless of content
- All emails from clients internal or external sources are to be deleted after 12 months unless required to operate our business
- Any emails relating to unsuccessful recruitment applications will be deleted within 3 months after the application has been reviewed
- Staff will take care not to send confidential/proprietary information to outside sources

Electronic Documents

Including word processing, spreadsheet, images, instant messaging, PDF files, and all other file sources. Retention also depends on the subject matter.

- **Instant messages:** The length of time that instant messages are kept varies on the content. IMs are mainly used for the transfer of media during the recruitment process from prospective applicants. These messages and the media contained is deleted after the application process is complete. Media and messages relating to other individuals may be held for up to two years

We do not automatically delete electronic files beyond the dates specified in this policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy. In certain cases a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

Instant messages: The length of time that instant messages are kept varies on the content. IMs are mainly used for the transfer of media during the recruitment process from prospective applicants. These messages and the media contained is deleted after the application process is complete. Media and messages relating to other individuals may be held for up to two years

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G. Insurance Records

Record Type	Retention Period
Certificates	Permanent
Claims files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance policies (including expired policies)	Permanent

H. Legal Files and Papers

Record Type	Retention Period
Legal memoranda and opinions (including all subject matter files)	7 years after close of matter
Litigation files	1 year after expiration of appeals or time for filing appeals
Court orders	permanent
Requests for departure from records retention plan	10 years
Register of members	Permanent
Minutes of directors' meetings	10 years

I. Miscellaneous

Record Type	Retention Period
Material of historical value (including pictures, publications)	Permanent
Policy and procedures manuals – original	Current version with revision history
Policy and procedures manuals copies	Retain current version only

J. Personnel Records

Record Type	Retention Period
Job applications/interviews of unsuccessful candidates	6 months or less (longer with explicit consent)
Employee personnel records (including individual attendance records, annual leave, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employment contracts – individual	7 years after separation
Employment records-correspondence with employment agencies and advertisements for job openings	3 years from date of hiring decision
Job descriptions	3 years after superseded
Working time opt-out forms	2 years
Current bank details of employees	Only as long as necessary

Note: Application forms should give the opportunity for subjects to object to their details being retained/processed.

K. Tax Records

General Principle: Companies must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits or other matters required to be shown in any such return. These documents and records shall be kept for as long as the contents thereof may become material in the administration of tax laws.

Record Type	Retention Period
Tax bills, receipts, statements	7 years
Tax returns	Permanent
Sales/use of tax records	7 years
Annual information returns	Permanent
Payroll/wage records for unincorporated businesses	5 years after 31 Jan following the year of assessment
PAYE records	3 years (minimum) from the end of the tax year to which they relate
Maternity records	3 years after the end of the tax year in which the maternity pay period ends