

A silver laptop is shown from a front-facing perspective. The screen displays a white background with a blue shield icon in the center. The shield contains a stylized folder icon. A blue rectangular box is overlaid on the left side of the laptop screen, containing the text "Data Retention Policy" in white.

Data Retention Policy

Overall Statement of Principles

The Data Protection Act requires the Company to retain records which include Personal Data for minimum periods of time dependant on current legislation. Other Personal Data will be held if relevant to the Company's need for business purposes and will be held dependant on the type of information and the need to retain some or all of it.

The act states that "personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes".

The purposes include for instance:

- ▶ HMRC
- ▶ Dept. of Work & Pensions
- ▶ Working Time Regulations



- ▶ Minimum Wage Regulations
- ▶ Maternity, Paternity, Adoption, Parental leave & pay and Statutory Leave &
- ▶ Sick Pay
- ▶ Health and Safety, including specific types of injuries, diseases and other dangerous occurrences.
- ▶ Monitoring of exposure to certain hazardous substances where the record shows personal exposure of identifiable employees
- ▶ Insurance claims

The Ogilvie Group will hold all personal data in a controlled manner and will dispose of personal data if, or once, it has become invalid e.g. disciplinary records.

Procedures

Each Company and Department within the Ogilvie Group will be responsible for ensuring good practice regarding the storing and secure disposal of personal data. Each Department will, on an annual basis, review the information held in their files and update or dispose of the information as required. Information must only be kept for a specific purpose and not held on a 'just in case' basis.

Each Department Manager will produce a written departmental procedure to be issued to members of staff.

Managers who receive job applications/CVs should return them along with interview notes to HR and destroy any copies they possess.

Managers who hold disciplinary interviews should return all documentation to HR and destroy any copies they possess.

Procedures will be reviewed by the Data Controller on an annual basis.

By order of the Board
Ogilvie Group

