

DATA RETENTION POLICY

1. Introduction

- 1.1. This Policy sets out the obligations of Field Sales Solutions Limited, a company registered in the United Kingdom under number 04521294, whose registered office is at Sterling House, 20 Station Road, Gerrards Cross, Buckinghamshire, SL9 8EL (“the Company”) regarding retention of personal data collected, held, and processed by the Company in accordance with EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).
- 1.2. The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 1.3. The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.
- 1.4. Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).
- 1.5. In addition, the GDPR includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:
- 1.6. Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
 - 1.6.1. When the data subject withdraws their consent;
 - 1.6.2. When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
 - 1.6.3. When the personal data is processed unlawfully (i.e. in breach of the GDPR); or
 - 1.6.4. When the personal data has to be erased to comply with a legal obligation;
- 1.7. This Policy sets out the type(s) of personal data held by the Company for recruitment and employment purposes, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

1.8. For further information on other aspects of data protection and compliance with the GDPR, please refer to the Company's Data Protection Policy.

2. Aims and Objectives

2.1. The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the GDPR.

2.2. In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Company, this Policy also aims to improve the speed and efficiency of managing data.

3. Scope

3.1. This Policy applies to all personal data held by the Company and by third-party data processors processing personal data on the Company's behalf.

3.2. Personal data, as held by the above is stored in the following ways and in the following locations:

- 3.2.1. the Company's servers, located in Oxford House, Oxford Road, Thame, Oxon OX9 2EN
- 3.2.2. third-party servers, operated in order to administer the working relationship with our employees
- 3.2.3. computers permanently located in the Company's premises at Oxford House, Oxford Road, Thame, Oxon OX9 2EN Laptop computers and other mobile devices provided by the Company to its employees
- 3.2.4. Physical records stored at in FS Distribution, Dormer Road, Thame, Oxon, OX9 3FS

4. Data Disposal

4.1. Upon the expiry of the data retention periods set out in the Employment records retention and erasure guidelines or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 4.1.1. Personal data stored electronically (including any and all backups thereof) shall be deleted securely by our ICT department;
- 4.1.2. Special category personal data stored electronically (including any and all backups thereof) shall be deleted securely by our ICT department;
- 4.1.3. Personal data stored in hardcopy form shall be securely shredded using a business supplied shredder or the "Shredit" method at Head Office;
- 4.1.4. Special category personal data stored in hardcopy form shall be securely shredded using a business supplied shredder or the "Shredit" method at Head Office;

5. Data Retention

5.1. As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

When establishing and/or reviewing retention periods, the following shall be taken into account:

- The objectives and requirements of the Company;
- The type of personal data in question;
- The purpose(s) for which the data in question is collected, held, and processed;
- The Company's legal basis for collecting, holding, and processing that data;
- The category or categories of data subject to whom the data relates;

If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

5.2. Employment records: retention and erasure guidelines

These guidelines support Field Sales Solutions' Data Retention Policy and Data Protection Policy and adopt its definitions

The guidelines are intended to ensure that the company processes personal data in the form of employment records in accordance with the personal data protection principles, in particular that:

- 5.2.1. Personal data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
- 5.2.2. Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When personal data is no longer needed for specified purposes, it is deleted or anonymised as provided by these guidelines.
- 5.2.3. Personal data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.
- 5.2.4. Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.
- 5.2.5. Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage.
- 5.2.6. Any questions about the operation of the guidelines should be submitted to yourdataGDPR@fieldsalesolutions.com.

5.3. Retention and Erasure of Recruitment documents

5.3.1. Field Sales Solutions' retains personal information following recruitment exercises to demonstrate, if required, that candidates have not been discriminated against on prohibited grounds and that recruitment exercises are conducted in a fair and transparent way.

Field Sales Solutions' candidate privacy notice advises candidates how long Field Sales Solutions' expects to keep their personal information for, once a recruitment decision has been communicated to them. This is likely to be for twelve months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by Field Sales Solutions'.

5.3.2. Information relating to successful candidates will be transferred to their employment record with Field Sales Solutions'. This will be limited to that information necessary for the working relationship and, where applicable, that required by law.

5.3.3. Following a recruitment exercise information, in both paper and electronic form, will be held by [the HR department. Destruction of that information will take place in accordance with these guidelines.

5.4. Retention and Erasure of Employment records

5.4.1. Field Sales Solutions' has regard to recommended retention periods for particular employment records set out in legislation, referred to in the table below. However, it also has regard to legal risk and may keep records for up to seven years (and in some instances longer) after your employment or work with us has ended.

Type of employment record	Retention period
<p>Recruitment records</p> <p>These may include:</p> <p>Completed online application forms or CVs.</p> <p>Equal opportunities monitoring forms.</p> <p>Assessment exercises or tests.</p> <p>Notes from interviews and short-listing exercises.</p> <p>Pre-employment verification of details provided by the successful candidate. For example, checking qualifications and taking up references. (These may be transferred to a successful candidate's employment file.)</p>	<p>Twelve months after notifying candidates of the outcome of the recruitment exercise.</p>

Criminal records checks. (These may be transferred to a successful candidate's employment file if they are relevant to the ongoing relationship.)	
Immigration checks	Three years after the termination of employment.
Contracts	
These may include: Written particulars of employment. Contracts of employment or other contracts. Documented changes to terms and conditions.	While employment continues and for seven years after the contract ends.
Collective agreements	
Collective workforce agreements and past agreements that could affect present employees.	Any copy of a relevant collective agreement retained on an employee's record will remain while employment continues and for seven years after employment ends.
Payroll and wage records	
Payroll and wage records Details on overtime. Bonuses. Expenses. Benefits in kind.	These must be kept for at least three years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they will be retained for seven years after employment ends.
Current bank details	Bank details will be deleted as soon after the end of employment as possible once final payments have been made
PAYE records	These must be kept for at least three years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they will be retained for seven years after employment ends.
Payroll and wage records for companies	These must be kept for six years from the financial year-end in which payments were made. However, given

	their potential relevance to pay disputes they will be retained for seven years after employment ends.
Records in relation to hours worked and payments made to workers	These must be kept for three years beginning with the day on which the pay reference period immediately following that to which they relate ends. However, given their potential relevance to pay disputes they will be retained for seven years after the working relationship ends.
Travel and subsistence.	While employment continues and for seven years after employment ends.
Record of advances for season tickets and loans to employees	While employment continues and for seven years after employment ends.
Personnel records	
<p>These include:</p> <p>Qualifications/references.</p> <p>Consents for the processing of special categories of personal data.</p> <p>Annual leave records.</p> <p>Annual assessment reports.</p> <p>Disciplinary procedures.</p> <p>Grievance procedures.</p> <p>Death benefit nomination and revocation forms.</p> <p>Resignation, termination and retirement.</p>	While employment continues and for seven years after employment ends.
Records in connection with working time	
Working time opt-out	Three years from the date on which they were entered into.
Records to show compliance, including:	Three years after the relevant period.

Time sheets for opted-out workers. Health assessment records for night workers.	
Maternity records	
These include: Maternity payments. Dates of maternity leave. Period without maternity payment. Maternity certificates showing the expected week of confinement.	Four years after the end of the tax year in which the maternity pay period ends.
Accident records	
These are created regarding any reportable accident, death or injury in connection with work.	For at least four years from the date the report was made.

6. Implementation of Policy

This Policy shall be deemed effective as of 25th May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

Implementation of Policy

This Policy has been approved and authorised by:

Name: Julian Cordy
Position: Chief Executive Officer
Date: 24th May 2018
Due for Review by: 25th May 2019