

PIPE & PIPER DATA RETENTION POLICY

1. ABOUT THIS POLICY

- 1.1 The corporate information, records and data of Pipe & Piper Limited (Pipe & Piper) are important to the running of our business.
- 1.2 There are legal and regulatory requirements which require us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.
- 1.3 This Data Retention Policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.
- 1.4 Failure to comply with this policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.6 This policy uses various definitions:

Data Protection Legislation: means the UK Data Protection Legislation and any other European Union legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of Personal Data (including, without limitation, the privacy of electronic communications).

UK Data Protection Legislation: means all applicable data protection and privacy legislation in force from time to time in the UK including the General Data Protection Regulation ((EU) 2016/679); the Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

The terms **Personal Data**, **Controller** and **Processor** shall have the meanings ascribed to them by the Data Protection Legislation.

2. SCOPE OF POLICY

- 2.1 This policy covers all data that we hold or have control over. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as data files, data collected by apps and websites, emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data. In this policy we refer to this information and these records collectively as "**data**".
- 2.2 This policy covers data that we hold which relates to our clients ("**Client Personal Data**") and also to users of websites, apps, cloud based software or content management systems, in relation to which we provide a technical function for our clients (such as hosting) ("**User Personal Data**").
- 2.3 This policy explains the differences between our formal or official records, disposable

information, confidential information belonging to others, personal data and non-personal data. It also gives guidance on how we classify our data.

3. GUIDING PRINCIPLES

3.1 Through this policy, and our data retention practices, we aim to meet the following commitments:

- To comply with legal and regulatory requirements to retain data;
- To comply with our data protection obligations, in particular to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle);
- To handle, store and dispose of data responsibly and securely;
- We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason;
- We allocate appropriate resources, roles and responsibilities to data retention;
- We regularly remind employees of their data retention responsibilities;
- We regularly monitor and audit compliance with this policy and update this policy when required.

4. ROLES AND RESPONSIBILITIES

4.1 Responsibility of all employees. We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. All employees must comply with this policy, the Record Retention Schedule, any communications suspending data disposal and any specific instructions from the Data Protection Officer. Failure to do so may subject us, our employees, and contractors to serious civil and/or criminal liability. An employee's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination. It is therefore the responsibility of everyone to understand and comply with this policy.

4.2 The Data Protection Officer. The Data Protection Officer is responsible for identifying the data that we must or should retain, and determining, in collaboration with external legal advisors, the proper period of retention. He also arranges for the proper storage and retrieval of data, co-ordinating with outside vendors where appropriate.

4.3 The Data Protection Officer is responsible for:-

- Administering the data management programme;
- Helping Pipe & Piper implement the data management programme and related best practices;
- Planning, developing, and prescribing data disposal policies, systems, standards, and procedures;
- Providing guidance, training, monitoring and updating in relation to this policy;
- For advising on and monitoring Pipe & Piper's compliance with the Data Protection Legislation.

5. TYPES OF DATA AND DATA CLASSIFICATIONS

5.1 The data we hold can be broken down into the following categories:-

- **Identity Data** including, for example, people's first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** including, for example, people's address, billing, delivery or email address and people's mobile and landline telephone numbers.
- **Financial Data** including, for example, people's bank account and payment card details.
- **Transaction Data** including, for example, details about payments made by and to people and other details of products and services they have purchased from our customers.
- **Technical Data** including, for example, internet protocol (IP) addresses, people's login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices people use to access our customer's websites.
- **Profile Data** including, for example, people's username and password, purchases or orders made by people, people's interests, preferences, feedback and survey responses].
- **Usage Data** including, for example, information about how people use our website at <https://pipeandpiper.co.uk> **Our Website**.
- **Marketing and Communications Data** including, for example, people's preferences in relation to receiving marketing communications from our customers and third parties and people's communication preferences.

6. RETENTION PERIODS

6.1 **Client Personal Data** We will retain **Client Personal Data** for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Generally under the law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years for tax purposes. See our **Data Retention Policy**.

We shall retain **Client Personal Data** for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect to our relationship with a client.

To determine the appropriate retention period for any particular type of **Client Personal Data**, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of such personal data, the purposes for which we process such personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We retain **User Personal Data** for various periods agreed with our clients on a case by case basis from time to time and in accordance with relevant Data Protection Legislation.

7. STORAGE, BACK-UP AND DISPOSAL OF DATA

- 7.1 Storage.** Our data and any data we hold on behalf of third parties must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to our business operations during an emergency must be duplicated and/or backed up at regular intervals and maintained off site.
- 7.2 Destruction.** The Data Protection Officer is responsible for the continuing process of identifying the data that has reached its required retention period and supervising its destruction. The destruction of confidential, financial, and employee-related hard copy data must be conducted by shredding if possible. Non-confidential data may be destroyed by recycling. The destruction of electronic data must be co-ordinated with.
- 7.3** The destruction of data must stop immediately upon notification from the Data Protection Officer that preservation of documents for contemplated litigation is required. This is because we may be involved in a legal claim or an official investigation. Destruction may begin again once the Data Protection Officer lifts the requirement for preservation.

8. SPECIAL CIRCUMSTANCES

- 8.1 Preservation of documents for contemplated litigation and other special situations.** We require all employees to comply fully with our Record Retention Schedule and procedures as provided in this policy. All employees should note the following general exception to any stated destruction schedule: If you believe, or the Data Protection Officer informs you, that certain records are relevant to current or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until the Data Protection Officer determines that those records are no longer needed. Preserving documents includes suspending any destruction requirements in the Record Retention Schedule and preserving the integrity of the electronic files or other format in which the records are kept.
- 8.2** If you believe this exception may apply, or have any questions regarding whether it may apply, please contact the Data Protection Officer.
- 8.3** In addition, you may be asked to suspend any routine data disposal procedures in connection with certain other types of events, such as our merger with another organisation or the replacement of our information technology systems.

9. WHERE TO GO FOR ADVICE AND QUESTIONS

- 9.1 Questions about the policy.** Any questions about this policy or retention periods should be raised with the Data Protection Officer.
- 9.2** For those based outside Pipe & Piper, questions or issues relating to Pipe & Piper's data retention policy should be addressed to the Data Protection Officer. He can be contacted either by post at Pipe & Piper Limited, 63 Wostenholm Road, Sheffield, South Yorkshire, S7 1LE, by phone on 0114 2555 855 or by email at info@pipeandpiper.co.uk.