



PASSION. DETERMINATION. LEADERSHIP

| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

Data Retention Policy

Introduction

Purpose

CIS Security Ltd is committed to being transparent about how it collects and uses the personal data and to meeting its data protection obligations. This policy sets out the organisation's commitment to data retention, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of all CIS stakeholders including job applicants, employees, workers, contractors, volunteers, interns, apprentices, former employees, clients, suppliers and future clients.

CIS Security Ltd has appointed Stuart Bateman as its Data Protection Officer. His role is to inform and advise the organisation on its data protection obligations. He can be contacted at dpo@cis-security.co.uk. Questions about this policy, or requests for further information, should be directed to the Data Protection Officer.

Definitions:

- » "Personal data" is any information that relates to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.
- » "Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.
- » "Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.



| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 2 -Public Data

1. Scope

All Organisation Name's records, whether analogue or digital, are subject to the retention requirements of this policy

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2 Asset owners are/responsible for ensuring that all personal data is collected, retained, and destroyed in line with the requirements of the GDPR,DPA 2018.
- 2.3 The Finance Director (FD) is responsible for retention of financial (accounting, tax) and related records.
- 2.4 The HR Director (HRD) is responsible for retention of all HR records.
- 2.5 The Health and Safety Manager (SHEQ) is responsible for retention of all Health and Safety records.
- 2.6 The Information Security Manager (ISM) is responsible for the retention of data within CIS IT systems.
- 2.7 The Data Protection Officer (DPO) is responsible for storage of data in line with this procedure.
- 2.8 The Managing Director (MD) is responsible for retention of all other statutory and regulatory records.
- 2.9 The Managing Director (MD) is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in (Retention of Records Master Log on the company server under the following categories):
 - 3.1.1 Record type
 - 3.1.2 Retention period

| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 3 -Public Data

- 3.1.3 Retention period to start from (at creation, submission, payment, etc.)
- 3.1.4 Retention justification
- 3.1.5 Record medium
- 3.1.6 Disposal method

Data Security

The organisation takes the security of personal data seriously. The organisation has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties. Access to the CIS internal IT infrastructure is controlled by password protection and as such has measures in place to minimise risk of illegal access from outside parties. All external third-party systems used by CIS are password protected and access is restricted in line with the role of employee.

All internal data used by CIS is backed up daily and held externally by a third party on servers located in the UK at a bomb-proof, flood-proof and EMP-proof data centre and holds both ISO27001 and ISO9001 certifications.

Document Owner and Approval

The Managing Director is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the GDPR, DPA 2018. A current version of this document is available to all stakeholders on the website and internal members of staff on the employee portal and Y:\ drive. It does not contain confidential information and can be released to relevant external parties. This information security policy was approved by the Board of Directors on 18/05/2018 and is issued on a version-controlled basis under the signature of CIS Managing Director.

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law and industry standards. Employees that fail to adhere to this policy may be subject to the organisation's formal disciplinary procedures.

Signature:



Date: 18th May 2018

Updated: 25/03/2024

| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 4 -Public Data

Data Retention Period

| Document Name | Retain for |
|--|--------------------|
| NSI file | Length of contract |
| Management Review | 3 Years |
| Site audit Reports | 3 Years |
| C complaints and N/C forms | 3 Years |
| Contacts | Length of contract |
| Consultant's Contacts | Length of contract |
| Consultation project proposals, costings and finished reports | 3 Years |
| Electronic Duty Log | 3 Years |
| Key Issuing | Length of contract |
| Site Visit Sheets | 1 Year |
| Processing of petty cash details for the company | 6 Years |
| Tendering for new Customers and Price increases for Existing Customers | 6 Years |
| Purchase Ledger | 6 Years |
| Sage Accounts 200 | 7 Years |
| TimeGate - Payroll and Finance Items | 7 Years |
| VAT Returns | 7 Years |
| Agreements | Length of contract |
| Length of contract | 7 Years |
| Reporting and dissecting finance information | 7 Years |
| Reporting and dissecting finance and payroll information | 7 Years |
| Document transactions on the bank account. | 7 Years |
| Details of fines re vehicles | Length of contract |
| Finance Pack for Managers | 7 Years |
| Reference information from HMRC and communications from HMRC | 5 Years |
| Insurance Policy Details | 5 Years |
| Letters to employees and other organisations | 7 Years |
| Management Accounts | 6 Years |
| New Supplier Documentation | 5 Years |



| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 5 -Public Data

| | |
|---|------------------------------|
| Information requests by the Office for National Statistics | 6 Years |
| 3-year Trend Accidents | 20 Years |
| Copy of H&S induction form | 20 Years |
| Accident Report Sheet | 20 Years |
| Name / location / Claim details | 20 Years |
| Accidents / investigation forms | 20 Years |
| Long Term Sickness Costings | 7 Years |
| Absence Monitoring Report | 7 Years |
| Staff Appraisals | 7 Years |
| AWOL | 7 Years |
| Recruitment & onboarding of new staff | 7 Years |
| Documents to support CIS defence against an employee claim against the company | 7 Years |
| Contracts of Employment for site based new starters | 7 Years |
| Personnel file for CIS current employees | 7 Years |
| DBS process and monitoring spreadsheet | 7 Years |
| DBS checks | 7 Years |
| Photos & employee signature | Length of contract |
| Contract of Employment / RTW / onboarding documents / employee relations / medical records / training records | 7 Years / length of contract |
| Name, address, job title, DOB, medical record | 7 Years / length of contract |
| Employee completed probation forms | 7 Years / length of contract |
| Probation spreadsheet to monitor the completion of probations | 7 Years / length of contract |
| Redundancy costs, matrixes, and letters to manage redundancy process | 7 Years / length of contract |
| Monitoring & working document of RTW status checks | 7 Years / length of contract |
| To record all employee liability information as part of the TUPE transfer due diligence process | 7 Years / length of contract |
| To record uniform orders for employees | 1 Year / length of contract |
| SIA Licence holder name and licence number | 3 Years / length of contract |
| Licence Dispensation Notices | 1 Year |



| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 6 -Public Data

| | |
|--|--|
| Applicant Details | 1 Year |
| Assignment instructions | 1 Year |
| Signed Contract Client | Length of contract |
| ECAF's | Length of contract |
| Correspondence with client | Length of contract |
| Monthly Awards – News sheets | 1 Year |
| Court Orders that CIS Security Ltd are required to process and make deductions from their pay. | End of Term of the Court Order and that taxation year plus 6 years |
| Processing bonus payments for employees. | End of Term of the Court Order and that taxation year plus 6 years |
| Details of transactions and communications with employees | 5 Years |
| Communications and details filed by Customer | Length of contract |
| Communications received from employees for address and bank details | Length of contract |
| Marketing and Processing Childcare Voucher Program | Length of contract |
| Excel, Pdf, Emails (payroll and employee | Length of contract |
| Sales & Marketing below | |
| Personal Descriptions - Name, Company Name, Phone number, company address Tracking - email address, social media Client | 3 Years |
| Personal Descriptions - Name, Company Name, Phone number, company address Tracking - email address, social media Sales | 3 Years |
| Personal Descriptions - Name, Company Name, Phone number, company address Tracking - email address, social media Staff | 3 Years |
| Personal Descriptions, Job Title, Name, Phone Number email Address & Office address Networking | 3 Years |
| Names and photos of staff with commendations for good works inclusive of where they work | 3 Years |
| TRAINING DEPARTMENT BELOW | |
| Names, Phone Numbers, Addresses, etc. Clients | Length of contract |



| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 7 -Public Data

| | |
|--|--------------------|
| Highfield Qualifications Centre Names, DOB, Gender Staff | 5 Years |
| Highfield CCTV Practical Assessment Names DOB | 5 Years |
| Highfield Identification Validation Name, Phone Number, Photo, Email Address, DOB | 5 Years |
| CCTV Operator within the Private Security Industry exam paper name DOB | 5 Years |
| Conflict Management within the Private Security Industry (exam)name DOB | 5 Years |
| Physical intervention Skills within the Private Security Industry (exam) Name DOB | 5 Years |
| Welcome Host Registration Form Name, Address, phone, Email | 1 year |
| Welcome All Registration Form Name, Address, phone, Email | 1 year |
| Training Register Name, Pin number | 5 Years |
| First Aid 1 Day Practical Assessment Matrix Name, DOB, Phone Number, Gender | 3 Years |
| First Aid 3 Day Practical Assessment Matrix Name, DOB, Phone Number, Gender | 3 Years |
| Qualification Examination Declaration and Learner List | 5 Years |
| Mentor Training Name, Phone, DOB, Gender | 5 Years |
| Sites Below | |
| Training Matrix | Length of contract |
| CIS Health & Safety Induction, Appraisals & DSE's | Length of contract |
| Training Certificates | Length of contract |
| Site Contacts | Length of contract |
| Site Induction Forms | Length of contract |
| CCTV Sign in book, on-site signing in documents, Electronic Daily Security Reports | 1 Year |
| Company AI'S | 1 Year |
| Incident Reports | 3 Year |
| Various Attendance Sheets (Mainly Fit for Kings) | 1 Year |
| TimeGate | Length of contract |
| Access Control (Gallagher) Name, Picture, K number, department details | Length of contract |
| Key Log Register | Length of contract |



| | | | |
|------------------------------|-----------------------|----------|-----------|
| Integrated Management System | | Date | 25/03/24 |
| Title | Data Retention Policy | Issue | 10 |
| Ref | IMSM.016 | Approved | N. Catton |

- 8 -Public Data

| | |
|--|--------------------|
| Escalation Sheets Name/email/telephone numbers | Length of contract |
|--|--------------------|

Change History Record

| Ref | Issue | Description of Change | Approval | Date of Issue |
|----------|-------|------------------------|-------------------|---------------|
| IMSM.016 | 2 | Initial issue | Managing Director | 18.05.18 |
| IMSM.016 | 3 | Review of Document | Managing Director | 23.03.20 |
| IMSM.016 | 4 | Review of Document | Managing Director | 15.03.21 |
| IMSM.016 | 5 | Review of Document | Managing Director | 23.03.22 |
| IMSM.016 | 6 | GDPR to DPA 2018 | Managing Director | 24.08.22 |
| IMSM.016 | 7 | GDPR 2018 | Managing Director | 30.01.23 |
| IMSM.016 | 8 | Added retention period | Managing Director | 13/12/23 |
| IMSM.016 | 9 | Review of Document | Managing Director | 25/02/24 |
| IMSM.016 | 10 | Review of Document | Managing Director | 25/03/24 |