



Data Retention Policy

Personal Data must only be kept for as long as necessary for our business purposes, at which point it must be deleted and must not be recoverable by any means.

- Personal data must have a retention period set before collecting it
- Where the company cannot control retention (where data is collected by a joint controller or controller in common), we will make reasonable endeavours to influence the other data controller to comply with our retention period.
- This retention period will be set after considering the following:
 - Applicable regulatory requirements – to be determined based on legal advice;
 - Applicable contractual requirements
 - *The company's* business need – to be detailed
- This retention period will be communicated to the Data Subject, in the consumer privacy policy, contract of employment, or other form of fair processing notice
- At the end of the retention period, the personal data must be deleted. Retention beyond this time could lead to serious consequences for the company, including fines and reputational damage.

Process

- All activity requiring personal information to be collected must also include the completion of a Privacy Impact Assessment (PIA) that will detail the retention period.
- The data retention period will be the minimum amount of time the company needs to keep the information to fulfil the purpose it was collected for.
- During the design stage of any new system, or choosing a 3rd party system, the recommendation is always to include automated retention and deletion as a mandatory system requirement.
- Where automated system retention and deletion is NOT possible, a clear process must be created to ensure this is completed manually. This will need to be created on a case by case basis as an output of the PIA.

Immediate actions to take across local applications/systems/data

- Ensure there is a process in place to set a retention period upfront before data is collected
- Complete a Privacy Impact Assessment for existing applications to check that retention and deletion is built in – if not, identify the gap and rectify
- Conduct a data review and cleansing activity across the business – ensure people review their locally stored data:
 - On PCs, desktop, My Documents etc
 - On 0365 and shared file servers
 - Physical paper records
- Conduct an awareness raising campaign

Category of personal data	Retention as per legal requirement	Retention as per contractual requirement	Retention for legitimate business purpose	Maximum retention period	Supporting Comments
[A]	[B]	[C]	[D]	(Greater of [B] / [C] / [D])	
CUSTOMER DATA RETENTION					
Customer Membership Records, incl. marketing preferences & spending information	N/A	N/A	5 years	5 years	Customer visits can be infrequent. A customer record would be removed after a 5 year period dated to last visit made
Self Exclusion Records	6 to 12 months	6 to 12 months	10 years	10 years	To ensure a behavioural profile is maintained in the event of persistent exclusion requests made by one individual
Accident Reports	3 years	3 years	6 years	6 years	We are required to retain records of accidents on our premises in case of subsequent disputes raised
Incident Reports	3 years	3 years	6 years	6 years	We are required to retain records of incidents on our premises in case of subsequent disputes raised
LCCP Logs & Complaints	2 years	2 years	10 years	10 years	It has been recommended that data which relates to social responsibility be retained for 10 years after customer's most recent visit
Anti-Money Laundering Reports & supporting documentation	5 years	5 years	10 years	10 years	It has been recommended that data which relates to anti-money laundering be retained for 10 years in case of subsequent criminal proceedings
Prize payout receipts & listings, incl. names & signatures	N/A	N/A	2 years	2 years	Retained for audit purposes and in case of subsequent dispute
Visitors books, including names & signatures	N/A	N/A	2 years	2 years	Retained for audit purposes and verification of LCCP procedures
Records of customer account cash deposits >£100 & withdrawals >£50	N/A	N/A	2 years	2 years	Retained for audit purposes and verification of LCCP & AML procedures (applicable where customer accounts facility is available)
Customer Account Credit Balance Listings	N/A	N/A	2 years	2 years	Retained for audit purposes and verification of monies owing to customers (applicable where customer accounts facility is available)
CCTV footage	N/A	N/A	14 days	3 years	Individual CCTV clips can be retained for up to 3 years if supporting an incident or dispute