



Data Retention Policy with Schedule

Hunter Maritime Services

Version	Date	Author
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Data Retention Policy with Schedule

Introduction

1. As part of the day-to-day running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is stored both as a hard copy and in electronic form.

Aims of the policy

2. Our business will ensure that the personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods or/and services – as required by data protection legislation, including the General Data Protection Regulation (GDPR).

Retention

3. This retention policy (along with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.
4. Decisions around retention and disposal are to be taken in accordance with this policy.
5. As and when the retention period for a specific document has expired, a review is always to be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration is to be given to the method of disposal.

Responsibility

Douglas Hunter is responsible for keeping this retention schedule up to date in order to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business.

Douglas Hunter is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

Douglas Hunter may delegate the operational aspect of this function to Suzana Hunter.

Disposal

Our business must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- Transmission of records to an external body
- Cloud storage

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Exceptional circumstances should be reported to Douglas Hunter without delay.

Appendix 1: Document retention schedule

Commercial contracts:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contracts with suppliers	[6] years after last action	Cloud Storage	Supply contract	Shred
Contracts with Customers	[6] years after last action	Cloud Storage	Supply contract	Shred
Contracts signed as a deed	[12] years after last action	Hard Copy	Contract	Shred
Guarantees and indemnities	The term of the guarantee plus 6 years	Hard Copy	Contract	Shred
Purchase orders and invoices	[7] years after last action	Cloud Storage	Accounting Data	Deletion of computer records

Marketing records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Mailing lists	1 year after last action	Cloud Storage	To assist with audit	Deletion of computer records

Tax and Accounting Records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Tax returns	10 years from end of fiscal year	Cloud Storage	Legal Requirement	Deletion of computer records
Accounting & financial management information	6 years from end of fiscal year	Cloud Storage	Legal Requirement	Deletion of computer records
Stock transfer forms and share certificates	20 years from purchase	Hard Copy	Legal Requirement	Shred

Operational records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Policies/Procedures	7 years	Cloud Storage	Operational Record	Deletion of computer records
Website FAQs	1 year from last action	Cloud Storage	[i.e. Issue is generally resolved upon response]	Deletion of computer records
Insurance schedules	10 years after last action	Cloud Storage	Financial Records	Deletion of computer records
Register of members	Life of company	Hard Copy	Legal Requirement	Shred
Memorandum of association	Life of company	Hard Copy	Legal Requirement	Shred
Register of directors and secretaries	Life of company	Hard Copy	Legal Requirement	Shred
Employer's liability insurance certificates	Life of company	Hard Copy	Legal Requirement	Shred

Email records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Email correspondence	3 Years	Cloud Storage	Operational Record	Deletion of computer records