

DEE COMMUNICATIONS LIMITED DATA RETENTION POLICY

1. Introduction

This Policy sets out the obligations of Dee Communications Limited a company registered in England and Wales under number 1366415, whose registered office is at: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA. (“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”).

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.

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. (Dee Communications will not intentionally collect any “sensitive” personal data).

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).

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:

- a) Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
- b) When the data subject withdraws their consent;
- c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
- d) When the personal data is processed unlawfully (i.e. in breach of the GDPR);

- e) When the personal data has to be erased to comply with a legal obligation;
- f) Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Company for marketing, maintaining customer relationships, providing products and services, entering into contracts, billing and accounting, and managing our human resources, 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.

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 Company is stored in the following ways and in the following locations:

- a) The Company's servers, located within the EEA;
- b) Computers permanently located in the Company's premises at: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA.;
- c) Laptop computers and other mobile devices provided by the Company to its employees;
- d) Physical records stored in the company's premises at: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA.;

4. Data Subject Rights and Data Integrity

All personal data held by the Company is held in accordance with the requirements of the GDPR and data subjects' rights thereunder, as set out in the Company's [Data Protection Policy](#).

4.1 Data subjects are kept fully informed of their rights, of what personal data the Company holds about them, how that personal data is used as set out in Parts 12 and 19 of the Company's [Data Protection Policy](#), and how long the Company will hold that personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).

4.2 Data subjects are given control over their personal data held by the Company including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict the Company's use of their personal data, as set out in Parts 13 to 16 of the Company's [Data Protection Policy](#).

5. Technical and Organisational Data Security Measures

5.1 Technical measures are in place within the Company to protect the security of personal data. Please refer to Parts 20 to 24 of the Company's Data Protection Policy for details.

5.2 Organisational measures are in place within the Company to protect the security of personal data. Please refer to Part 25 of the Company's Data Protection Policy for details.

6. Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, 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:

6.1 Personal data stored electronically shall be deleted securely and permanently using the most appropriate method for the type of data;

6.2 Personal data stored in hardcopy form shall be shredded or sent for destruction;

7. Data Retention

7.1 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.

7.2 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.

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

- a) The objectives and requirements of the Company;
- b) The type of personal data in question;

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

7.4 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.

7.5 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):

7.5.1 Data used for managing customer accounts (Customer Records) will be reviewed annually and held for a period of six years following the closure of the customer's account. This is company policy.

7.5.2 Data used for legal documentation and contracts related to the provision of products and services (Contractual Arrangements) will be reviewed annually held for a period of six years following contract termination. This is company policy.

7.5.3 Data used for managing and recording the Company's financial transactions (Financial Records) will be held for a period for a period of six years including the current year. This is HMRC policy.

7.5.4 Data used for managing human resources including payroll records (Personnel Records) will be reviewed annually and held for a period of six years following the current year. This is a CIPD recommendation.

7.5.5 Data used for monitoring usage or our products and services and providing customer and technical support (Support) will be reviewed annually and held for a period of six years following the closure of a subject's account. This is company policy.

7.5.6 Data used for marketing our products and services (Marketing) will be reviewed annually and held for a period of one month following the withdrawal of a subject's consent. This is company policy.

8. Roles and Responsibilities

8.1 The Company's Data Protection Officer can be contacted by email at: data-protection@deecommunications.co.uk or by post at: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA.

8.2 The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other Data

Protection-related policies (including, but not limited to, its [Data Protection Policy](#)), and with the GDPR and other applicable data protection legislation.

8.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods throughout the Company.

8.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Officer.

[9. Implementation of Policy](#)

This Policy shall be deemed effective as of [06/07/2018](#). No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.