

# The George Community Pub (Wickham Market) Limited

A Community Benefit Society



THE GEORGE  
Community Pub

## Data Retention Policy

### Introduction

This policy sets out how the Society will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of the GMC Data Protection Policy.

### Roles and Responsibilities

The Society's Management Committee (MC) is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Manager for MC is Richard Fordham, who together with the MC is responsible for the secure and fair retention and use of data by the Society. Any questions relating to data retention or use of data should be directed to the Data Protection Manager.

### Regular Data Review

A regular review of all data will take place to establish if the Society still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place in August 2020.

### Data to be Reviewed

- Society stores data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Digital data stored on third party online services (e.g. MailChimp, DropBox)
- Physical data stored at the homes of Members

### Who will review by conducted by

The review will be conducted by the Data Protection Manager with other MC Members to be decided on at the time of the review.

### How will data be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
  - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
  - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

## Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

## Statutory Requirements

Date stored by the Society may be retained based in on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Members Register.
- Gift Aid declarations records.
- Details of payments made and received (e.g. in bank statements and accounting records).
- Committee Members and Member sub groups meeting minutes.
- Contracts and agreements with suppliers/customers.
- Insurance details.
- Tax and employment records.

## Other data retention procedures

### Members data

- When a member sells their shares and leaves all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted.
- Unless consent has been given data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

### Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- If a “Friend of The George” unsubscribes from the mailing list, any data will be removed.
- All other data will be stored safely and securely and reviewed as part of the next two year review

### Volunteer and Contractor data

- When a volunteer or contractor stops working for or with the Society and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted.
- Unless consent has been given data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

### Other data

- All other data will be included in a regular two year review.