

# CUPAR DEVELOPMENT TRUST

## Data Retention Policy 2018

### Purpose & Scope

This policy sets out the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information held by Cupar Development Trust ("CDT")

This Policy applies to CDT's Board Members, employees, contractors, consultants, volunteers, advisors and service providers who may collect, process, or have access to data (including personal and/or sensitive data). It is the responsibility of all of the above to familiarise themselves with this Policy and ensure compliance with it.

This policy applies to all information used within CDT. Examples of documents include: Emails; Hard copy documents; Soft copy documents; Video and audio; Data generated by physical access control systems; and photographic records of individuals or events

### General Retention Principle

In the event, for any category of documents not specifically defined elsewhere in this Policy (and in particular within the Data Retention Schedule) and unless otherwise mandated differently by applicable law, the required retention period will be **deemed to be 3 years from the date of creation of the document.**

### General Retention Schedule

The time period for which documents and electronic records should be retained is set out in the **Data Retention Schedule**. Retention periods can be prolonged in certain cases such as when exercising legal rights in cases of lawsuits or other court or tribunal proceedings.

### Destruction of Data

The CDT Board will ensure that its Data Controller and others who access personal data, regularly review all data, whether held electronically or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant.

The data should be deleted, shredded or otherwise destroyed to a degree equivalent to their value and their level of confidentiality. The method of disposal is dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly sensitive personal data) must be disposed of as confidential waste and be subject to secure electronic deletion.

The employee concerned shall perform the tasks and assume the responsibilities of destruction. The specific deletion or destruction process may be carried out by an employee or by an internal or external service provider. Any applicable provisions under relevant data protection laws and CDT's Personal Data Protection Policy shall be complied with. The applicable statutory requirements for the destruction of information, particularly requirements under applicable data protection laws, shall be fully observed.

## **Document Disposal**

Records which may be routinely destroyed, unless subject to an on-going legal or regulatory inquiry are:

- Announcements and notices of day-to-day meetings and other events;
- Requests for ordinary information such as travel directions;
- Reservations for internal meetings without charges / external costs;
- Documents such as letters, e-mails and similar items that do not add any value;
- Superseded address list, distribution lists etc.;
- Duplicate documents, unaltered drafts, snapshot printouts or extracts from day files;
- Stock in-house publications which are obsolete or superseded; and
- Trade magazines, vendor catalogues, flyers and newsletters from other external organizations.

In all cases, disposal is subject to any disclosure requirements which may exist in the context of litigation.

## **Breaches**

The Data Manager has the responsibility of ensuring that CDT complies with this Policy. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate (see CDT's Data Breach Policy for further information).

## **Policy review**

This policy was approved by the CDT board on 20<sup>th</sup> June 2018 and is operational from that date.

This policy is due for review in May 2019.

## **Data Manager:**

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