

Union Jack Club

Retention Procedure

1. Scope

The retention requirements of this procedure apply to all records held by Union Jack Club, whether in electronic or hardcopy format.

2. Responsibilities

Employees in the following roles are responsible for adhering to the following GDPR requirements:

Role	Responsibility
Data Processors	To ensure that the collection, retention and destruction of all personal data by Union Jack Club is carried out according to the requirements of the GDPR.
Finance Controller	To ensure that all financial records, including accounting and tax records are retained.
HR Manager	To ensure that all HR records are retained.
Health and Safety Officer	To ensure that all Health and Safety records are retained.
Company Secretary	To ensure that all relevant statutory and regulatory records are retained (with the exception of the aforementioned records listed above).
Change Manager – Deputy Chief Executive	To ensure that all personal data is stored according to this procedure.
Manager/Executive	To ensure that personal data records that are retained are added to business continuity and disaster recovery protocols.

3. Procedure

The DPO is required to maintain a schedule of all personal data items held by Union Jack Club, recording the following information:

- Record name;
- Record type;
- Original owner of personal data;
- Data classification;

- Storage date;
- Retention period required;
- Planned date of destruction; and
- Any additional information such as passwords and cryptographic keys and other means to access the data.

4. Change Manager

In relation to storing electronic data, Union Jack Club agrees not to exceed 90% of the manufacturer recommended storage life. The Deputy Chief Executive shall be responsible for maintaining a schedule of all storage media used by Union Jack Club and their expected shelf life, including the date on which the storage media is due to reach 90% of its expected shelf life.

Once storage media reaches the 90% mark, the Change Manager is responsible for duplicating the data onto a new storage media.

The Change Manager is also responsible for destroying personal data that has reached the end of its retention period and must do so within 30 days. All records that have been destroyed must be listed in a schedule setting out how each type of record was destroyed, by reference to classification and media.

Electronic media stored in portable or removable media must be destroyed according to Disposal of Removable Storage Media 92017-H Policy.

5. Procedure for accessing stored data

Union Jack Club shall only access stored data in line with the following procedure:

Stored data is accessed by using Millennia software programme by individual password.

6. Document owner

The Data Processor is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document dated 1st March 2018 is available to all members and guests of Union Jack Club on the Club's website or for staff on the Club's Internet and will be included in the Club's training program undertaken by Heads of Department.

This policy document was approved by Union Jack Club's Board of Trustees and is issued by the Chief Executive Officer ("CEO") on a version controlled basis.

Name of CEO: Mr Simon Atkins

Date: 1st March 2018

Change history record

Issue	Description of Change	Approval	Date of Issue
1	n/a	n/a	n/a
2	n/a	n/a	n/a
3	n/a	n/a	n/a