

RETENTION AND DISPOSAL POLICY

(personal data)

1. Introduction

This is the retention policy of Ingot Portal Limited ("Ingot Portal", "us" or "we"), which applies to records we hold containing or relating to personal data.

When we refer to personal data in this policy, this means any information about an individual from which that person can be identified. For more information about personal data and how we use it, please see our privacy policy.

2. About this policy

This policy sets out:

- the general timescales for which we will retain relevant records;
- requirements for the disposal of relevant records.

This policy only relates to records we hold containing or relating to personal data. Other records are covered by other policies.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, please contact our Data Protection Officer using the contact details set out at the bottom of this policy.

This version of the retention and disposal policy is effective as of **12 July 2021**.

3. Changes to this policy

We reserve the right to amend this policy at our sole discretion, without prior notice to you. However, this does not affect your applicable rights as set out in our privacy policy.

4. Records covered by this policy

This policy applies to relevant records applicable to personal data held by Ingot Portal:

- relating to any person in connection with the employment or engagement of people by us, including:
 - our employees, former employees and prospective employees (including temporary workers);
 - certain existing, former and prospective contractors or consultants; and
 - individuals who have a family relationship or other connection with the above

people, whose details we obtain from those people in connection with their employment or engagement;

- relating to others, such as the customers and suppliers of Ingot Portal; and
- which we obtained through use of our website.

Unless otherwise specified, this policy refers to both paper records and 'soft copy' records.

5. How long we will keep relevant records

Records will ordinarily only be kept for as long as is necessary for the purposes for which the relevant personal data is to be used, as set out in our privacy policy. However, the retention period may be longer:

- in accordance with any applicable provisions of our privacy policy; or
- if permitted or required by legal and regulatory requirements.

The Record Retention Schedule below sets out the applicable retention periods we normally apply to relevant records.

6. Review

Notwithstanding the Record Retention Schedule below, our Data Protection Officer will from time to time review the retention periods for records or different categories of information and will determine whether they should be destroyed or retained for a further period, having regard to applicable legal and regulatory requirements or the provisions of our privacy policy.

7. Destruction of records

Relevant records will be destroyed in the following ways:

- records held in paper format will be cross-cut shredded and pulped or burnt;
- electronic or soft-copy records will be destroyed using means appropriate to render them non-recoverable;
- where applicable, individual folders will be permanently deleted from the system; and
- electronic equipment which is disposed of which contains relevant records will be destroyed after first using killdisk (or similar) to permanently erase the relevant records.

8. Records of destructions

We will not be obliged to document the disposal of records when doing so in accordance with the Record Retention Schedule.

Where we dispose of relevant records other than in accordance with the Record Retention Schedule (either by being disposed of earlier or kept for longer than listed), we will ordinarily document such disposal for audit purposes (but without referring to any identifiable individual to which the records related).

9. Contacting us

If you have any questions about this policy, please contact us by:

- writing to us at:
Lynsey Morrison, Data Protection Officer
Ingot Portal Limited
Suite 321, Cotton Exchange Building
Old Hall Street
Liverpool
L3 9LQ
- or:
- emailing our Data Protection Officer by sending an email to:
lynsey.morrison@ingotportal.com.

Record Retention Schedule – records applicable to employee/contractor/visitor personal data

Description	Retention Period	Comments/Relevant Legislation
Wage/salary records (also overtime, bonuses, expenses)	6 years	Taxes Management Act 1970
National minimum wage records	3 years after the end of the pay reference period following the one that the records cover	National Minimum Wage Act 1998
Records relating to working time	2 years from date on which they were made	The Working Time Regulations 1998
Income tax and NI returns, income tax records and correspondence with the Inland Revenue/HMRC	Not less than 3 years after the end of the financial year to which they relate	The Income Tax (Employments) Regulations 1993
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	6 years from the end of the scheme year in which the event took place	The Retirement Benefits Schemes (Information Powers) Regulations 1995
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	3 years after the end of the tax year in which the maternity period ends	The Statutory Maternity Pay (General) Regulations 1986
Statutory Sick Pay records, calculations, certificates, self-certificates	7 years	Limitation Act 1980
Time cards/time records	2 years after audit	
General personnel files and training records (including disciplinary records)	7 years after the employee leaves Ingot Portal/cessation of engagement	Limitation Act 1980
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	7 years from the date of redundancy	Limitation Act 1980
Accident books, accident records/reports	3 years after the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21)	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), Limitation Act 1980
Records relating to children/young adults (for example, relating to pension information/life assurance for employees)	Until that person reaches the age of 22 (or older if still required for the relevant purposes)	Limitation Act 1980

Description	Retention Period	Comments/Relevant Legislation
Child care vouchers, CSA payments	7 years after the employee leaves Ingot Portal	Limitation Act 1980
HMRC tax deduction data (P45 & P60 data)	7 years after the employee leaves Ingot Portal	Limitation Act 1980
P11ds for relevant benefits	7 years after the employee leaves Ingot Portal	Limitation Act 1980
Parental leave records	6 years from birth/adoption of the child or 19 years if the child receives a disability allowance	Limitation Act 1980
Pension scheme investment policies	12 years from the ending of any benefit payable under the policy	
Assessments under health and safety regulations and records of consultations with safety representatives and committees	As required by law	
Senior executives' records (i.e. those on a senior management team or their equivalents)	As required by law	
Application forms and interview notes (for unsuccessful candidates)	1 year after decision made not to offer a role	

Record Retention Schedule – customer/supplier/website records

Description	Retention Period	Comments/Relevant Legislation
Website/general enquiries records (where no contract is entered into)	1 year after the last date of enquiry (or relevant longer period where information used for legitimate purposes or with consent)	
Credit check results	1 year	
Contracts which include personal data (other than those executed by way of deed)	7 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to the above contracts, including payments and financial information	7 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Contracts executed by way of deed which include personal data	13 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to the above contracts, including payments and financial information	13 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to legal proceedings (other than relating to contracts executed by way of deed)	7 years from the date on which the dispute arose or legal proceedings were threatened/ contemplated/ issued/ concluded (whichever is longer)	Limitation Act 1980
Records relating to legal proceedings relating to contracts executed by way of deed	13 from the date on which the dispute arose or legal proceedings were threatened/ contemplated/ issued/ concluded (whichever is longer)	Limitation Act 1980
Application forms/records relating to proposed contracts	1 year after date of last record/activity	