

**Data Retention Policy**

1. **Introduction:**

This Policy sets out the obligations of Loose Ends regarding retention of personal data collected, held and processed by Loose Ends 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, online identifier, social identify etc.

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 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:

1. Where the personal data is no longer required for the purpose for which it was originally collected or processed
2. When the data subject withdraws their consent
3. When the data subject objects to the processing of their personal data and Loose Ends has no overriding legitimate interest
4. When the personal data is processed unlawfully
5. When the personal data has to be erased to comply with a legal obligation
6. **Aims and Objectives:**

The 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.

1. **Data Security Measures:**

Loose Ends has the following operational measures in place to protect the security of personal data:

1. Home based volunteers will be aware of their work space and the security of their equipment and ensure no personal data can be accessed by other people (e.g. family members).
2. Any paper-based notes and electronic files will be stored in a secure location, separate from the volunteer’s personal files.
3. Volunteers will dispose of all Loose Ends data in accordance with the agreed Loose Ends data disposal requirements.
4. E-mails sent to multiple recipients will use the blind carbon copy (bcc) facility where it is inappropriate to share personal data.
5. Spreadsheets will be password protected. Passwords will be strong and changed regularly.
6. No personal data may be transferred to any individual who is not authorised to receive it.
7. E-mails will not be retained or stored in a hard copy format.
8. **Erasing data:**

Upon the expiry of the data retention periods set out in Part 5 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:

1. Personal data stored electronically shall be deleted securely
2. Personal data stored in hardcopy form shall be shredded
3. **Data Retention:**

Loose Ends 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.

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

1. The objectives and requirements of Loose Ends
2. The type of personal data in question
3. The purpose(s) for which the data in question is collected, held and processed
4. The legal basis for collecting, holding, and processing the data
5. The category or categories of data subject to whom the data relates
6. **Data Disposal:**

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| Data Subject: | Disposal: |
| Volunteer/Supervisor/Member | * Within six months of becoming inactive or when communication is no longer relevant
* On request
* Following disciplinary action
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| Friends of Loose Ends | * When communication is no longer relevant
* On request
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| External contacts (signposting etc.) | * When communication is no longer relevant
* On request
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| Donors and sponsors | * When communication is no longer relevant
* On request
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| Donors and sponsors (where specifically included in financial records) | * Minimum of 6 years and generally indefinitely
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| Suppliers (where specifically included in financial records) | * Minimum of 6 years and generally indefinitely
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1. **Adoption**

This policy was adopted on 6th June, 2018