

Fishmongers Tavern Data Retention Policy

Effective Date: 21/08/2024

1. Purpose

The purpose of this Data Retention Policy is to ensure that Fishmongers Tavern (“the Company”) handles the collection, storage, and disposal of personal and business-related data in compliance with applicable legal requirements, including the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. This policy sets guidelines for the retention and disposal of various categories of data processed by the Company.

2. Scope

This policy applies to all employees, contractors, third parties, and systems processing personal or business data for Fishmongers Tavern. It covers all personal data held by the Company, including customer data, employee data, and supplier data.

3. Key Principles

Fishmongers Tavern adheres to the following key principles regarding data retention:

- **Lawfulness and Transparency:** Data will be retained in accordance with legal, regulatory, and operational requirements. Data subjects will be informed about how long their data will be kept.
- **Data Minimization:** Data will only be retained for as long as necessary to fulfill the purpose for which it was collected.
- **Security:** Appropriate technical and organizational measures will be in place to protect personal data during its retention period.
- **Accountability:** The Company will document and be able to demonstrate compliance with this policy.

4. Retention Periods

Different types of data will be retained for varying periods based on legal requirements and the operational needs of the business.

4.1. Customer Data

- **Type:** Name, contact details, loyalty card information, and purchasing history.
- **Purpose:** Customer relationship management, marketing, loyalty program administration.
- **Retention Period:** 5 years from the date of the last interaction, unless the customer requests the deletion of their data or withdraws consent.
- **Disposal:** Securely deleted after retention period, or upon customer request, subject to legal obligations.

4.2. Employee Data

- **Type:** Name, contact details, employment records, payroll information, tax information, performance records.
- **Purpose:** Employment administration, payroll processing, tax reporting.
- **Retention Period:** 7 years after the termination of employment, to comply with legal and tax obligations.
- **Disposal:** Secure deletion or destruction (shredding) of paper records; secure digital deletion.

4.3. Supplier and Vendor Data

- **Type:** Name, contact details, contractual information, and financial records.
- **Purpose:** Supplier relationship management, financial reporting, auditing.
- **Retention Period:** 6 years from the end of the fiscal year in which the data was last relevant.
- **Disposal:** Secure deletion or destruction (shredding) of paper records; secure digital deletion.

4.4. Financial Data

- **Type:** Transaction records, invoices, receipts, and account details.
- **Purpose:** Financial record-keeping, auditing, regulatory compliance.
- **Retention Period:** 6 years from the end of the fiscal year in which the financial record was created, as required by UK tax law.
- **Disposal:** Securely deleted or destroyed after the retention period.

4.5. Marketing Data

- **Type:** Email addresses, customer preferences, marketing consents.
- **Purpose:** Marketing communications, promotional offers, event invitations.
- **Retention Period:** Until the customer withdraws consent or 2 years from the last interaction, whichever comes first.
- **Disposal:** Secure deletion upon withdrawal of consent or expiration of the retention period.

4.6. Loyalty Program Data

- **Type:** Name, loyalty card number, purchase history, and reward details.
- **Purpose:** Administer loyalty rewards, provide customer service.
- **Retention Period:** 2 years from the last use of the loyalty card.
- **Disposal:** Secure deletion of loyalty account details upon inactivity for 2 years or upon customer request.

4.7. CCTV Footage

- **Type:** Video footage captured in and around Fishmongers Tavern for security purposes.
- **Purpose:** Security, crime prevention, and staff safety.
- **Retention Period:** 30 days, unless required for an investigation or legal proceedings.
- **Disposal:** Automatic overwriting or secure deletion.

5. Data Disposal

When data reaches the end of its retention period or is no longer necessary for its original purpose, it will be securely destroyed. The following methods will be employed:

- **Physical Records:** Paper records will be shredded or incinerated.
- **Digital Data:** Electronic data will be permanently deleted, ensuring that it cannot be recovered.
- **Backups:** Any relevant backup copies of the data will also be securely deleted.

6. Exceptions

In certain situations, Fishmongers Tavern may be required to retain data for longer than the specified retention periods, such as:

- If required by law or court order.
- If necessary to protect the Company's legal interests.
- If required for ongoing investigations, litigation, or disputes.

In such cases, the Data Protection Officer (DPO) or a designated member of the management team will assess and document the reasons for the extended retention period.

7. Responsibilities

- **Data Protection Officer (DPO):** Responsible for overseeing the implementation of this policy and ensuring compliance with data protection laws.
- **Managers and Supervisors:** Responsible for ensuring that employees are aware of and comply with this policy.
- **Employees:** Responsible for adhering to the guidelines and ensuring that data is handled, stored, and disposed of properly.

8. Review and Amendments

This Data Retention Policy will be reviewed annually and updated as necessary to reflect changes in laws, regulations, or operational requirements. Changes to the policy will be communicated to all employees and relevant third parties.

Approved by:

Name: Matthew Hagon

Title: Data Protection Officer

Date: 21st August 2024