

Data Retention Policy

Salix Finance Limited

1. Introduction

1.1 Data management is critical to the effective conduct of business operations. Salix Finance Limited ('Salix' or 'the Company') collects personal data from a wide range of sources which it retains for operational reasons.

1.2 Salix is committed to maintaining good management of the personal data it holds to ensure that it retains the data only as required for its business operations or as required by law. Salix manages the personal data it holds well, especially with respect to storage, access and disposal.

1.3 The legal and regulatory framework governing data management and retention is:

- i) The UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018
- ii) The Freedom of Information Act (FOIA) 2000
- iii) The Environmental Information Regulations (EIR) 2004

The Information Commissioner oversees compliances with these legislations. The Commissioner has power to sanction non-compliance.

1.4 This policy sets out Salix' commitments as they relate to retention of the personal data it holds. It forms a part of Salix' overall data protection documentation and is to be read along with other relevant policies, including:

- i) Publication Scheme [\[link\]](#)
- ii) Freedom of Information & Environmental Information Regulations Policy [\[link\]](#)
- iii) Complaints Policy [\[link\]](#) [\[policy under draft\]](#)
- iv) Data Protection and Privacy Policy for employees [\[link\]](#)

2. Scope

- 2.1 The policy states how Salix manages the personal data it holds and to ensure the data is retained only for as long as needed. It sets out minimum standards of conduct expected from users of personal data and the legal conditions that must be satisfied in relation to the retention of personal data.
- 2.2 The policy applies to personal data in all documents in all formats, including but not limited to documents in electronic or physical formats.

3. Roles and Responsibilities

- 3.1 This policy applies to all staff and to staff working on behalf of Salix. This includes all permanent members of staff, contractors, temporary and contract workers and to any 3rd party organisation engaged by Salix.
- 3.2 All staff have a responsibility under this policy to ensure that personal data held by Salix is managed and retained as provided for in this policy and in line with best practice. Poor record keeping exposes Salix to risks such as non-compliance with its legal and regulatory duties, data loss, poor levels of service, complaints, data breaches or the loss of trust and confidence in Salix.
- 3.3 The policy will ensure records are readily accessible when needed, improve working practices as they relate to data management, provide a consistent approach to the disposal of personal data and ensure that such data is not wrongly discarded.
- 3.4 The following staff members shall have the additional responsibility to ensure Salix staff comply with this policy:
 - i) Chief Executive;
 - ii) Freedom of Information Lead & Data Protection Officer;
 - iii) Director of Human Resources;
 - iv) Director of Finance and Resources;
 - v) Director of Programmes;
 - vi) Director of Programmes & Technical Services

4. Data – collection, retention and disposal

- 4.1 Effective and accurate management of personal data is key to ensuring Salix complies with its legal and regulatory responsibilities. Salix collects the personal data it holds legally and fairly, and only as

indeed for its business. It retains personal data having evidential or legal importance but, in all cases, only as provided for in legislation.

- 4.2 The Salix officer who receives personal data or creates a record using personal data shall ensure the data is accurately stored and is readily accessible. The officer shall facilitate securing the data and to arrange for it to be backed up where it is necessary to do so. Security and backup shall be carried out in conjunction with Salix' IT department.
- 4.3 Personal data that is no longer required shall be disposed of promptly. Salix shall keep a good record of its actions and decisions with respect to the personal data it holds. The records are evidence of how Salix may have used personal data and for any audit purposes. The records will also facilitate prompt responses to data subject access requests.
- 4.4 The data within the scope of this policy is set out in **Appendix 1**. All data is processed on one or more of the legal grounds provided in data protection legislation. That is on grounds of consent, contract performance, compliance with a legal obligation, vital interests of the data subject, on public interest grounds or Salix' legitimate interest.
- 4.5 The items listed in appendix 1 include documents created internally within Salix, emails, social media correspondence, hard copy letters, client application forms and documents, employee CV's, records and related information held and maintained as part of its business.
- 4.6 The policy directs against keeping multiple copies of personal data. Unnecessary copies of personal data must be securely disposed. Unnecessary paper copies of documents containing personal data must be disposed of securely and confidentially.
- 4.7 As all staff will be using data and creating records as they carry out their daily tasks, they shall ensure personal data is retained only as provided for under this policy.
- 4.8 Retention of personal varies according to the class of data concerned (depending on whether it is personal data, special category data or data received in confidence). The timeline for retention of the different data classes is also set out in appendix 1.
- 4.9 Where an item of personal data does not fall within any of the categories listed in appendix 1, advice may be sought from Salix' Data Protection Officer.