

Record Retention Policy Summary

Overview

Stannp maintains a comprehensive Record Retention Policy in compliance with UK GDPR and the Data Protection Act 2018. We retain records and information only for legitimate business reasons and in full compliance with UK data protection laws, guidance and best practice.

Policy Objectives

Our data retention approach is designed to set clear limits for retaining personal data, comply fully with data subject rights under GDPR, ensure safe and secure disposal of confidential information, and mitigate risks related to confidential data breaches.

Retention Principles

We retain personal data for no longer than necessary to achieve the purposes for which it was collected. All retention periods are established considering the requirements of our business, the type of personal data, the purpose of processing, the lawful basis for processing, and the categories of data subjects involved. Where statutory retention periods don't exist, we identify and document the criteria used to determine appropriate retention periods.

Data Storage and Security

Documents are always retained in secure locations with access limited to authorised personnel only. All data is stored on cloud-based servers located in Ireland (within the EEA), ensuring compliance with GDPR requirements. We implement 256-bit AES encryption for data at rest and TLS 1.2/1.3 encryption for data in transit, with all encryption keys managed through Azure Key Vault.

Information Asset Owners

All systems and records have designated Information Asset Owners (IAOs) throughout their lifecycle to ensure accountability. Data and records are never reviewed, removed, accessed or destroyed without prior authorisation and knowledge of the Information Asset Owner.

Secure Disposal Procedures

When retention periods expire, we ensure secure destruction of all confidential information. Paper records are disposed of through our professional shredding service provider, with regular collections and certificates of disposal. Electronic records and IT equipment disposal is managed by our IT team, who ensure complete data removal that prevents reconstruction. All disposal activities are documented and recorded.

Data Subject Rights

We recognise that data subjects have specific rights to request erasure of their personal data, though this is not an absolute "right to be forgotten". We will erase personal data when it's no longer necessary for its original purpose, when consent is withdrawn, when there's no overriding

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legitimate interest for continued processing, when data was unlawfully processed, or when erasure is required to comply with legal obligations.

Compliance and Monitoring

Our Compliance and Operations Director oversees all data retention processes, with records of all archiving and destruction activities maintained. We conduct regular audits and monitoring of our records management, archiving and retention practices. Information Asset Owners are tasked with ensuring continued compliance and review of records within their remit.

Suspension for Legal Matters

If we receive any legal request for records, or if litigation or investigations commence, we immediately suspend disposal of any scheduled records until we determine their requirement for legal purposes.

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