

Record retention and protection policy

For candidates applying to The Holistic Group Limited
23.05.18

1.0 Introduction

The Holistic Group Limited, a company incorporated in England & Wales (registration number: 4792134) whose registered office and trading address is at 24 Southwark Bridge Road, London SE1 9HF ("the Company"), collects and processes a great deal of data in order to conduct everyday operations.

When it comes to retaining and protecting data relating to individuals there are some key legal requirements with which the Company needs to comply. The purpose of this statement is to set out how the Company meets these requirements and to ensure that every individual who provides data to the Company understands how data is stored, how it is protected and for how long it is retained.

This policy should be viewed alongside the:

- Privacy statement
- Data breach notification procedure
- Data subject access request procedure

The record retention and protection policy is one element of how the Company fulfils the obligations under the General Data Protection Regulation 2016 ("GDPR").

2.0 General principles

The Company has some clear requirements when it comes to the protection and retention of personal data. These are:

- the Company must retain the data that is needed in order to comply with legal, regulatory and contractual requirements.
 - the Company must not hold data for longer than is necessary.
 - The Company must ensure that only people who have a genuine need to see the data are able to access it.
 - the Company must protect the data held so as to ensure it remains confidential and that the treatment of the data does not breach the privacy rights of individuals.
 - the Company must be able to retrieve data in line with business requirements and in line with the requirements of the Data subject access request procedure.
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3.0 The data we hold and how we store it

Data as detailed in our privacy statement:

- name and address
 - telephone number
 - personal email address
 - date of birth
 - CV
 - employment references
 - application form/covering letter
 - interview notes
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This data is stored electronically on our server and on email and is protected as our laptops, phones, email accounts and server are all password protected.

We will keep this data for 12 months post the close of the recruitment process. We feel this is a reasonable time to enable us to re-visit former candidates who were not appointed. Also, candidates have 3 months in which to challenge our decision through the ET process and are currently able to submit a claim even if it is out-of-time, to which we would need to be able to respond and we would require this data in order to be able to do that.

4.0 Record destruction

Once records have reached the end of their life in accordance with the record retention policy, the Company will securely destroy them. Paper records will be shredded and electronic records will be deleted from all medium (servers, hard drives, cloud based systems etc.).

5.0 Record review

The Company will review the approach taken to record retention and protection on a regular basis with the aim of the review being to:

- ensure that the retention periods continue to balance the Company's legal obligations with the rights of data subjects.
 - ensure that the Company is adhering to the agreed approach to record retention and destruction.
 - ensure that the way in which data is stored allows it to be retrieved in a timely fashion.
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6.0 Concerns and questions

GDPR is new legislation and how the rules are interpreted will continue to evolve. The Company will continue to adopt best endeavours to ensure on-going compliance but any employee who has concerns regarding any of the actions that are being taken or feels that they are unclear as to how the Company is complying with elements of the legislation should raise their concerns with the Office Manager. Your concerns will be investigated and responded to within 28 days.
