

Lighthouse
Data Retention Policy
Part 2 of Data Protection Policy

1. Introduction

This Policy is Part 2 of our Data Protection Policy and sets out the type(s) of personal data held by the Company, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to other parts of the Lighthouse Data Protection Policy.

This policy has four separate parts:

- 1. Main part**
- 2. Data Retention – this document**
- 3. Data Breach**
- 4. Employee Data Protection**

2. Aims and Objectives

- 2.1 The primary 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. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the GDPR.
- 2.2 In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Company, this Policy also aims to improve the speed and efficiency of managing data.
- 2.3 This policy is to be read in conjunction with the rest of the Data Protection Policy. Particular headings are highlighted here to underline the sections of the policy that particularly apply.

3. Data Retention

- 3.1 As per the Data Protection policy, and as required by law, the Company 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.
- 3.2 The Lighthouse retains personal information for 7 years after it is last needed. This is to provide services, references, for any clients who avail of our services after leaving, or information for bodies such as HMRC (for employees). It may be retained longer in cases of a legal requirement, Safeguarding or other overriding requirements.
- 3.3 When establishing and/or reviewing retention periods, the following shall be taken into account:
 - a) The objectives and requirements of the Lighthouse;

- b) The type of personal data in question;
 - c) The purpose(s) for which the data in question is collected, held, and processed;
 - d) The Company's legal basis for collecting, holding, and processing that data;
 - e) The category or categories of data subject to whom the data relates;
- 3.4 Notwithstanding the defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

4. Roles and Responsibilities

The Company's Data Protection Officer is, Dr. Harvey Grahame-Smith, drharvey@livingrivers.cc. The Data Protection Officer is responsible for overseeing the Data Protection and Retention Policy including its implementation and compliance.

Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Officer.

5. Implementation of Policy

This Policy shall be deemed effective as of 1/5/18. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Harvey Grahame-Smith

Position: Data Lead and Trustee

Date: 15/4/21

Due for Review by: 1/5/24

Signature:

