

A man with short brown hair and a beard, wearing a light blue button-down shirt, is looking down at a smartphone he is holding with both hands. The background is a blurred indoor setting with warm lighting. The word "DANBRO" is written in white serif font in the top left corner.

DANBRO

Danbro Trading Group

Data Retention Policy

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1. INTRODUCTION

This policy sets out the obligations of the Danbro Group (“the Company”) regarding the retention of personal data collected, held and processed by the Company in accordance with the General Data Protection Regulation (“GDPR”)

This Policy sets out the type(s) of personal data held by the Company, the purposes of the data, 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 the Company’s Privacy Policies which are available on www.danbro.co.uk

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.

3. SCOPE

3.1 This Policy applies to all personal data held by The **Danbro Group**

3.2 The Danbro Group is made up of a number of companies, including but not limited to:

- Danbro Trading Group
- Danbro Accounting Limited
- Danbro Employment Umbrella
- Danbro Financial Planning
- Trafalgar Workforce Solutions
- Trafalgar Accounting Limited
- Black Diamond Accountancy Services
- Higsons Limited

3.3 Personal data, as held by the above is stored in the following ways and in the following locations:

- The Company’s servers, located in Jubilee House, East Beach, Lytham St Anne’s FY8 5FT
- Third-party servers, operated by Synapse and are located off Company premises
- Computers permanently located in the Company’s premises at Jubilee House, East Beach, Lytham St Anne’s, FY8 5FT
- Laptops, computers and other mobile devices provided by the Company to its employees

- Computers and mobile devices owned by employees, agents, and subcontractors.
- Physical records stored in Jubilee House, East Beach, Lytham St Anne's, FY8 5FT

4. DEFINITIONS

4.1 The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

4.2 The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).

5. DATA SUBJECT RIGHTS AND DATA INTEGRITY

All personal data held by the Company is held in accordance with the requirements of the GDPR and data subjects’ rights thereunder, as set out in the Company’s Privacy Policies.

5.1 Data subjects are kept fully informed of their rights, of what personal data the Company holds about them, how that personal data is used and how long the Company will hold that personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).

5.2 Data subjects are given control over their personal data held by the Company including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict the Company’s use of their personal data, the right to data portability, and further rights relating to automated decision-making and profiling.

6. TECHNICAL AND ORGANISATIONAL DATA SECURITY MEASURES

6.1 The following technical measures are in place within the Company to protect the security of personal data:

- a) Personal data may only be transmitted over secure networks;
- b) Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative;
- c) Personal data contained in the body of an email, whether sent or received, should be stored securely. The email itself and associated temporary files should be deleted;

- d)** Where personal data is to be transferred in hardcopy form, it should be passed directly to the recipient;
- e)** All personal data transferred physically should be transferred in a suitable container marked “confidential”;
- f)** No personal data may be shared informally and if access is required to any personal data, such access should be formally requested from the IT Director;
- g)** All hardcopies of personal data, along with any electronic copies stored on physical media should be stored securely;
- h)** No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation;
- i)** Personal data must be handled with care at all times and should not be left unattended or on view;
- j)** Computers used to view personal data must always be locked before being left unattended;
- k)** No personal data should be stored on any mobile device, whether such device belongs to the Company or otherwise [without the formal written approval of the IT Director and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary];
- l)** No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the Company’s Data Protection Policy and the GDPR;
- m)** All personal data stored electronically should be backed up regularly with backups stored onsite and offsite. All backups should be encrypted;
- n)** All electronic copies of personal data should be stored securely using passwords and encryption;
- o)** All electronically sent personal data should be protected by a password where possible.
- p)** All passwords used to protect personal data should be changed regularly and must be secure;
- q)** Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. The IT team do not have access to passwords;
- r)** All software should be kept up-to-date. Security-related updates should be installed as soon as reasonably possible after becoming available;
- s)** No software may be installed on any Company-owned computer or device without approval; and
- t)** Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Marketing Team to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

6.2 The following organisational measures are in place within the Company to protect the security of personal data:

- a)** All employees and other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company’s responsibilities under the GDPR and under the Company’s Data Protection Policy;
- b)** Only employees and other parties working on behalf of the Company that need access to, and use of,

personal data in order to perform their work shall have access to personal data held by the Company;

- c)** All employees and other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- d)** All employees and other parties working on behalf of the Company handling personal data will be appropriately supervised;
- e)** All employees and other parties working on behalf of the Company handling personal data should exercise care and caution when discussing any work relating to personal data at all times;
- f)** Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- g)** The performance of those employees and other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- h)** All employees and other parties working on behalf of the Company handling personal data will be bound by contract to comply with the GDPR and the Company's Data Protection Policy;
- i)** All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of the Company arising out of the GDPR and the Company's Data Privacy Notice;
- j)** Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under the GDPR and/or the Company's Data Privacy Notice, that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

7. DATA DISPOSAL

Upon the expiry of the data retention periods set out below in this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 7.1** Personal data stored electronically (including any and all backups thereof) shall be deleted;
- 7.2** Personal data stored in hardcopy form shall be placed in confidential waste;
- 7.3** Special category personal data stored in hardcopy form shall be placed in confidential waste.

8. DATA RETENTION

- 8.1** As stated above, 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.
- 8.2** Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out in Appendix A.
- 8.3** When establishing and/or reviewing retention periods, the following shall be taken into account:
 - a)** The objectives and requirements of the Company;
 - 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.

8.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

8.5 Notwithstanding the following 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).

8.6 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

9. ROLES AND RESPONSIBILITIES

9.1 The Company's Data Protection Officer is contactable on data.officer@danbro.co.uk.

9.2 The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the company's other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with GDPR and other applicable data protection legislation.

9.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods.

9.4 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.

Appendix A - Retention Schedule - All Services

Purpose of Processing	Data Processed	Lawful Basis for	Retention Trigger	Delete After
To monitor your use of our information and communication systems to enable us to ensure that our software performs in accordance with our contract with you and to assess improvements and developments	Name, email address	Contractual Obligations	Cease Engagement/End of Employment	6 years
To conduct data analytics studies to review and better understand our customer base, remuneration, retention and attrition rates to enable us to ensure that our software performs in accordance with our contract with you and to assess improvements and developments	Email, phone, address, rate of pay, gender, date of birth, occupation	Contractual Obligations	Cease Engagement/End of Employment	6 years
To provide you with information and guidance on anything which may impact on atypical working in the recruitment/temporary worker sector (such as legislative changes, government consultations, sourcing statistical information to support our contribution to this sector of society)	Name, email address, contact information	Contractual Obligations	Cease Engagement/End of Employment	6 years
To provide you with information and guidance on efficient ways to maximise your take home pay and various services offered (such as personal service companies, sole trader/self-employed, CIS and/or other models/vehicles available in the market)	Name, email address, phone number, contact information, rate of pay	Consent	Cease Engagement/End of Employment	6 years
To enable other businesses within the Danbro Group to notify you of support services which may be of interest to you or your business	Name, email address, phone number,	Consent	Cease Engagement/End of Employment	6 years
To notify you of offers, promotions, which may interest you or your business should you wish to refer a friend to us for employment within the Danbro Group or to use any of our products or services.	Name, email address, phone number,	Consent	Cease Engagement/End of Employment	6 years
To provide you with updates, guidance, general and tailored advice which is (or may be in the future) relevant to you or your business	Name, email address, phone number,	Consent	Cease Engagement/End of Employment	6 years
Monitoring our service and completing audits to ensure compliance with our internal standards as well as external requirements including but not limited to GDPR and preventing fraud.	Name, Date of Birth, Address, history, email address, phone number, NI Number, UTR, profession, ID/RTW documents, nationality, marital status, payroll history	Contractual Obligations	Cease Engagement/End of Employment	6 years

Appendix A - Retention Schedule - Accountancy Clients

Purpose of Processing	Data Processed	Lawful Basis for	Retention Trigger	Delete After
Collecting all the necessary information to start our relationship with you	Name, Date of Birth, Address, Address history, email address, phone number, NI Number, UTR, profession, passport MRZ number and expiry, driving license number and issue date nationality, marital status	Contractual Obligations	Cease Engagement	6 years
Ascertaining your fitness to act as a director of your business in compliance with legislation including Anti-Money Laundering	Name, Date of Birth, Address, Address history, passport MRZ number and expiry, driving license number and issue date	Legal Obligation	Cease Engagement	6 years
Creating your limited company through Companies House	Name, Date of Birth, Address, Nationality of Directors/ Shareholders	Contractual Obligations	Cease Engagement	6 years
Providing payroll services to you and your business	Name, Addresses, NI numbers, Date of Birth, Tax Codes of employees	Contractual Obligations	Cease Engagement	6 years
Registering for Services with HMRC	Name, Address, NI Number	Consent	Cease Engagement	6 years
Obtaining agent authority for the HMRC portal in order to submit self-assessment and/or register for VAT/PAYE services	Name, email address	Consent	Cease Engagement	6 years
Providing you support and advice in the completion and filing of your self-assessment tax returns	Name, Address, Date of Birth, UTR, NI number	Contractual Obligations	Cease Engagement	6 years
Providing support, accounting and bookkeeping services to you and your business	Name, Email Address	Contractual Obligations	Cease Engagement	6 years
Advising and assisting with your decision about your salary, remuneration and compensation	Name, Email Address, rate of pay, other income	Contractual Obligations	Cease Engagement	6 years
Making decisions about your continued engagement with us and making arrangements for the termination of our working relationship	Name, Email Address	Contractual Obligations	Cease Engagement	6 years
Dealing with disputes involving you	Name, Email Address	Contractual Obligations	Cease Engagement	6 years
To assist you in opening a business bank account so that you can be paid for work carried out	Name, date of birth, address, email, phone ,NI number	Consent	Cease Engagement	6 years
To enable our third party insurance providers to offer you products or services to enable you to comply with your legal obligations or otherwise support your business	Name, date of birth, address, email, phone ,NI number	Consent	Cease Engagement	6 years

Appendix A - Retention Schedule - Umbrella Contractor Employees

Purpose of Processing	Data Processed	Lawful Basis for	Retention Trigger	Delete After
Checking your identity and confirmation of your right to work in the UK	Name, email address, home address, DOB, photo, ID document, RTW document, share code, certificate of application	Contractual Obligations	End of Employment	6 years
Analysing your assignment information (including location of work, duration of working time, income, timesheet and invoicing information) to enable us to perform the terms of our engagement with you	Name, home address, NI number, rate of pay, hours worked, DOB	Contractual Obligations	End of Employment	6 years
Understanding and analysing working patterns to ensure compliance with legal obligations	Name, NI number, rate of pay, hours worked, DOB	Legal Obligation	End of Employment	6 years
To prevent fraudulent payments	Name, bank details	Legal Obligation	End of Employment	6 years
To honour our duty of care by being able to contact someone in an emergency situation	Name, relationship to contractor, contact number	Vital Interest	End of Employment	Immediately
Processing payroll and making payments to your bank account(s)	Name, NI number, DOB, rate of pay, hours worked, bank account number and sort code	Contractual Obligations	End of Employment	6 years
To process any necessary attachments of earnings	Name, DOB, home address	Legal Obligation	End of Employment	6 years
To process any relevant statutory payments, including SSP, SMP and SPP	Name, DOB, home address, relevant health data	Contractual Obligations	End of Employment	6 years
Analysing and processing your eligibility for and making payment of any expenses incurred during the course of your work	Name, home address, work address, hours worked, vehicle details	Legal Obligation	End of Employment	6 years
Equal opportunities monitoring in relation to providing access to our services	Name, DOB, gender, rate of pay, nationality	Legal Obligation	End of Employment	6 years
To assess your suitability to work from your home address	Name, home address	Legal Obligation	End of Employment	6 years
To undertake any employee relations process including Disciplinary and Grievance	Name, contact details, nature of dispute	Contractual Obligations	End of Employment	6 years
Informing recruitment businesses of necessary information in order to comply with obligations imposed by s44 Income Tax Earnings and Protection Act 2003	Name, rate of pay, hours worked	Contractual Obligations	End of Employment	6 years
To comply with the Government's auto-enrolment pension directive and then process any further pension contributions	Name, DOB, email, address, salary information	Legal Obligation	End of Employment	6 years
To demonstrate that the Working Time Regulations are being/have been met	Name, hours of work	Legal Obligation	End of Employment	6 years
To ensure compliance with regulations including the National Minimum Wage Act 1998 and the Income Tax Regulations 1993	Name, hours of work, DOB, salary information	Legal Obligation	End of Employment	6 years
To ensure that termination of employment is properly documented and to provide details for employment references	Name, DOB, dates of employment, reason for leaving	Contractual Obligations	End of Employment	6 years
To administer benefits provided to you as part of our service	Name, home address, DOB, email address	Contractual Obligations	End of Employment	6 years