

RETENTION OF RECORDS (TIER 2)

Document Control

Reference: GDPR DOC 2.3

Issue No: 1.1

Issue Date: 25/05/2018

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1. Scope

All Cognus's records, whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2 Asset owners are/responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR.
- 2.3 The Head of Resources is responsible for retention of financial (accounting, tax) and related records.
- 2.4 The Head of People is responsible for retention of all HR records.
- 2.5 The Managing Director is responsible for retention of all Health and Safety records.
- 2.6 The Head of Resources is responsible for retention of all other statutory and regulatory records.
- 2.7 The Head of Resources is responsible for storage of data in line with this procedure.
- 2.8 The Managers named above responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in (Retention of Records – [GDPR REC 4.9](#)) under the following categories:
 - 3.1.1 Record type
 - 3.1.2 Retention period
 - 3.1.3 Retention period to start from (at creation, submission, payment, etc.)
 - 3.1.4 Retention justification
 - 3.1.5 Record medium
 - 3.1.6 Disposal method
- 3.2 Each data asset that is stored is marked with the name of the record, the record type, the original owner of the data, the information classification (Information Classification Procedure [GDPR-C DOC 8.2](#)), the data of storage, the required retention period, the planned date of destruction, and any special information (e.g. in relation to cryptographic keys).
- 3.3 Cryptographic keys, which are required for are retained.
- 3.4 For all storage media (electronic and hard copy records), Cognus retains the means to access that data through maintaining accurate data security documentation.
- 3.5 For all electronic storage media, Cognus does not exceed the manufacturer's recommended storage life. This is recorded in the Log of Information Assets for

Cognus

Restricted

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- Disposal ([GDPR-C REC 11.2.7](#)). When the maximum of life is reached, the stored data is copied onto new storage media.
- 3.6 The procedure for accessing stored data is detailed in Access Control Rules and Rights for Users/User Group ([GDPR-C DOC 9.1.2](#)).
 - 3.7 The Head of Resources is responsible for destroying data once it has reached the end of the retention period as specified in Retention and Disposal Schedule ([GDPR REC 4.9](#)). Destruction must be completed within 30 days of the planned retention period. Destruction is handled as follows: Asset owners will ensure that all paper data records are shredded onsite using approved data disposal methods, electronic records will be deleted from all systems aligned to the Retention and Disposal Schedule.
 - 3.8 Portable/removable storage media are destroyed in line with [GDPR-C DOC 11.2.7](#).

Document Owner and Approval

The Head of Resources is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all staff and employees on the Intranet.

This procedure was approved by the Head of Resources on 24th May 2018 and is issued on a version controlled basis under his/her signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Head of Resources	21/05/18
1.1	Amendment of Job Titles	Head of Resources	25/05/2018