



Data Retention Policy

DRP-001

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1. INTRODUCTION

- 1.1. Information is one of ClipTraining corporate assets; in the course of carrying out its' various functions, ClipTraining accumulates information from both individuals (clients, partners, and staff) and external organizations. ClipTraining also generates a wide range of data, which is recorded in documents and records.
- 1.2. These documents and records are in several different formats, examples of which include, (but are not limited to) communications such as letters, emails and attendance notes; financial information including invoices, statements and reports; legal documents such as contracts and deeds; and information relating to various types of applications, including forms, plans, drawings and conference call recordings.
- 1.3. Although ClipTraining is comprised of a mostly remote workforce, for the purposes of this Policy, the terms 'document' and 'records' include information in both hard copy and electronic form.
- 1.4. In certain circumstances it will be necessary to retain specific documents in order to fulfil statutory or regulatory requirements and also to meet operational needs. Document retention may also be useful to evidence events or agreements in the case of disputes, and also to preserve information which has historic value.
- 1.5. Premature destruction of documents could result in inability to defend litigious claims, operational difficulties and failure to comply with General Data Protection Regulation (GDPR).
- 1.6. Equally, the retention of all documents and records is impractical and the concept of appropriate disposal is encouraged and followed. Disposal will assist ClipTraining to maintain sufficient electronic and office storage space and will de-clutter office accommodation, resulting in a more desirable working environment. Lengthy or indefinite retention of personal information could result in ClipTraining breaching the Data Protection Act 1998 or non-compliance with GDPR.
- 1.7. It is important for the above reasons that ClipTraining has in place systems for the timely and secure disposal of documents and records that are no longer required for business purposes.

2. OBJECTIVES

- 2.1. The key objective of this Policy is to provide ClipTraining with a simple framework which will govern decisions on whether a particular document should be retained or disposed of. In the case of documents which are to be retained by ClipTraining, the Policy includes guidance on the format in which they should be retained and appropriate retention periods.
- 2.2. Implementation of the Policy should save Management's time when retrieving information, in particular by reducing the amount of information that may be held unnecessarily.
- 2.3. The Policy in relation to document retention and disposal applies to both ClipTraining records held and managed by external service providers and those held by ClipTraining.
- 2.4. It is envisaged that this Policy will assist ClipTraining in securing compliance with legal and regulatory requirements, including GDPR, the Data Protection Act 1998 and all other applicable laws and regulations. In addition to assisting management in their day to day business, this should also ensure that searches for information requests are as quick as possible.
- 2.5. Additionally, the Policy should help to ensure that ClipTraining archives records and documents that are of historical value appropriately for the benefit of the company.

3. SCOPE

This Document Retention Policy applies to all information held by ClipTraining and its external service providers where they are processing information on ClipTraining behalf.

4. POLICY STATEMENT

ClipTraining will ensure that information is not kept longer than is necessary and will retain the minimum amount of information that it requires to carry out its' statutory functions and the provision of services.

5. RETENTION AND DISPOSAL POLICY

- 5.1. Decisions relating to the retention and disposal of documentation should be taken in accordance with this Policy, in particular:
- Appendix A – Documents Type, Retention Period and Disposal Method
- 5.2. Circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of it. This review should not be particularly time consuming and should be straightforward. If the decision to dispose of a document is taken, then consideration should be given to the method of disposal to be used.

6. ROLES AND RESPONSIBILITIES

- 6.1. ClipTraining management, CISO, or Chief Privacy Officer will be responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.
- 6.2. ClipTraining may delegate the operational aspect of this function to one or more of its service providers.
- 6.3. ClipTraining should seek advice (expert or legal counsel) if they are uncertain as to whether minimum retention periods are prescribed by law, or whether the retention of a document is necessary to protect ClipTraining position where a potential claim has been identified.

7. DISPOSAL

- 7.1. When documents are disposed of, the method of disposal should be appropriate to the nature and sensitivity of the documents concerned.
- 7.2. Documents can be disposed of by any of the methods indicated in:
- Appendix A – Documents Type, Retention Period and Disposal.
- 7.3. It is essential that any documents which are to be thrown away, and may contain confidential or personal data must be disposed of in this way, in order to avoid breaches of confidence or of the Data Protection Act 1998, and GDPR

7.4. ClipTraining will review and assess how they manage the data they receive or generate on an annual basis. Steps to identify and address any potential weaknesses, will be taken as appropriate.

8. SECURITY

ClipTraining will need to ensure that all data (hard copy or electronic) is kept securely and access is only available to authorized personnel. In-depth policy and procedures on secure access and data handling can be found across ClipTraining's security policies and procedures.

APPENDIX A

Documents Type, Retention Period and Disposal

ClipTraining has adapted a data retention and data disposal scheme based on its official data classification tiers.

Classification	Minimal Disposal Method	Retention Period
Confidential	<ul style="list-style-type: none">• Wipe• Erasure• Degaussing• Extreme physical destruction (drill/crush/hammer)• Electronic shredding• Solid state shredding	<p>Portal Data deemed inactive or no longer of business use shall not be retained for a period longer than 2 years past the inactivity date unless requested by the customer to purge in which case the inactive Portal and its data will be purged immediately. Once purged there is no recovery of data.</p> <p>User Accounts and their associated data will be automatically purged at 90 days when user's account is placed into the Trash. Admins always have the option to delete the User Account and associated data from the Trash on demand. Once purged there is no recovery of data.</p>

Internal	<ul style="list-style-type: none"> • Overwriting the media/reformat/reimage • Magnetic erasure of the media • Any form of physical destruction 	<p>Portal Data deemed inactive or no longer of business use shall not be retained for a period longer than 2 years past the inactivity date unless requested by the customer to purge in which case the inactive Portal and its data will be purged immediately. Once purged there is no recovery of data.</p> <p>User Accounts and their associated data will be automatically purged at 90 days when user's account is placed into the Trash. Admins always have the option to delete the User Account and associated data from the Trash on demand. Once purged there is no recovery of data.</p>
Proprietary	<ul style="list-style-type: none"> • Any form of overwriting • Any form of physical destruction 	<p>Portal Data deemed inactive or no longer of business use shall not be retained for a period longer than 2 years past the inactivity date unless requested by the customer to purge in which case the inactive Portal and its data will be purged immediately. Once purged there is no recovery of data.</p>

		<p>User Accounts and their associated data will be automatically purged at 90 days when user's account is placed into the Trash. Admins always have the option to delete the User Account and associated data from the Trash on demand. Once purged there is no recovery of data.</p>
Public	<ul style="list-style-type: none"> • All Methods are appropriate 	<p>Portal Data deemed inactive or no longer of business use shall not be retained for a period longer than 2 years past the inactivity date unless requested by the customer to purge in which case the inactive Portal and its data will be purged immediately. Once purged there is no recovery of data.</p> <p>User Accounts and their associated data will be automatically purged at 90 days when user's account is placed into the Trash. Admins always have the option to delete the User Account and associated data from the Trash on demand. Once purged there is no recovery of data.</p>