



GDPR: DATA RETENTION PROCESS

Fluorocarbon Group incorporating: Fluorocarbon Limited, Fluorocarbon Surface Technologies Ltd & Fluorocarbon Polymers SRL
Policy name: General Data Protection Regulations (GDPR) Data Retention Process
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Employee Data Retention Process

Data protection law prohibits Fluorocarbon from keeping information (personal data) longer than is necessary for the purposes for which we use it. Fluorocarbon's Data Protection Policy, which is available <http://www.fluorocarbon.co.uk/cookies/privacy-policy> explains this obligation and sets out the general principles we follow in relation to the retention and erasure of personal data.

This Data Retention Process, which supports the Data Protection Policy, deals with the retention and erasure of personal data about customers and suppliers. It sets guideline retention periods for personal data and explains what we expect to do to ensure that personal data is deleted or destroyed at the appropriate time and in a secure way.

Please note that we may update this Data Retention Process at any time.

Retention Periods for personal data

Where possible, we have indicated how long we should retain identified categories, types or items of personal data in the "Guideline Retention Periods" in the Appendix to this Process. When deciding on these retention periods, we took into account the following Data Retention Criteria:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process the personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up to date
- for how long the personal data might be relevant to possible future legal claims (for more details, see below)
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

We expect all of our employees to apply the Guideline Retention Periods set out in the Appendix to this Process most of the time.

Where no Guideline Retention Period is specified for a particular category, type or item of personal data, the appropriate retention period should be decided by considering the Data Retention Criteria. Sometimes you may also find it a helpful starting point to look at the indicative 'long-stop' retention periods for the relevant broad category of personal data that is set out in the Employee Privacy Notice available via the (For more detail, see **Why are the retention periods in the Privacy Notice longer?**)

Why are the retention periods in the Privacy Notice longer?

Data protection law requires us to inform Customers and Suppliers how long we retain their personal data or, if this is not possible, to tell them what criteria we use to determine how long we will keep it. We do this in our Privacy Notice available here: <http://www.fluorocarbon.co.uk/cookies/privacy-policy>

You will notice that some of the retention periods listed in the Privacy Notice differ from those in the Guideline Retention Periods set out in the Appendix to this Process. This is because the retention periods in the Privacy Notice relate to broad categories of Customer and Supplier personal data, whereas the Guideline Retention Periods in this Process break down these broad categories of personal data into more detailed subsets of data. In addition, the retention periods in the Privacy Notice are intended to inform Customers and Suppliers of the *longest* period for which we will generally hold their personal data, whereas it will often be appropriate to delete or erase certain items of personal data before this long-stop date.

Retention and erasure in practice

In order to comply with our retention and erasure obligations, we require you to adhere to the following sections of this Process document.

Instructions and training

We expect all of our employees to familiarise themselves with this Process and, where it falls within their responsibility, to follow this Process and any other instructions or training they are given relating to the retention and deletion of personal data from time to time.

Failure to comply with data protection law may expose Fluorocarbon and, in some cases, individual Employees to serious legal liabilities. These can include criminal offences and fines of up to EUR20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher. In addition, an individual may seek damages from us in the courts if we breach their rights under data protection law. Breaches of data protection law can also lead to serious damage to our brand and reputation. In addition to the legal liabilities, failure to comply with your obligations under this Process could lead to disciplinary action and, in serious cases, it could result in the termination of your employment.

Storing personal data in easy to find locations and minimising unnecessary copies

You should follow any protocols, instructions or training relating to the storage of personal data and the minimisation of unnecessary copies.

If personal data is stored in easy to find locations, then it is much easier to review and, consequently, easier to delete at the appropriate time. Storing personal data in as few places as possible not only avoids the possibility that duplicate copies are not updated and become out of sync, but also reduces the risk that additional copies are retained after the central document has been deleted. Employees should work from and update a single central copy where possible. For example: Sales documents and records should be stored on the Sales portal only, and not on our own computer etc.

If they do print or save their own copies of documents containing personal data while they are dealing with a relevant issue, they should delete or destroy these when their involvement with the issue has ended and the most up-to-date/final version of the relevant record has been stored in the appropriate central location, e.g. saved on the Sales Portal/Shared drive..

Reviewing current personal data on a regular basis

Regular reviews of personal data help to ensure that personal data is not retained longer than is necessary for the identified purposes.

The Data Protection Champion(s) are responsible for conducting regular reviews of current files to ensure that the personal data they contain remains relevant and is not retained for longer than necessary; Line managers are responsible for ensuring that they review the personal data they store in hard and soft copy on a quarterly basis.

When carrying out a data cleansing exercise, we will consider if there is a genuine risk of a legal claim or complaint in the particular circumstances as we may need to depart from the Guideline Retention Periods if there is.

Deleting/destroying Customer and Suppliers details

Customer and suppliers personal data must be deleted or destroyed securely in accordance with the Data Protection Policy and Electronic Communications Policy.

In particular, we must:

- *securely shredding of hard copy files*
- *deleting electronic records from online HR portal or other centralised database, deleting back-up records, etc.*
- *deleting personal data from electronic devices (including removable storage devices) when it is no longer required (this means not simply deleting files, but also emptying the recycle bin on your desktop/ laptop/tablet/other devices as applicable)*

- *ensuring personal data is wiped from redundant devices e.g. old laptops, mobile phones, memory sticks, performance output data from redundant machinery, etc.*
- *removing personal data from software, applications, intranet, etc.*
- *deleting individually held paper and electronic copies of personal data*
- *following company instructions about the deletion of emails*

Archiving: electronic and/or hard copy archiving

Archiving or moving personal data to storage locations which are less easily accessed can be a good way of ensuring that the personal data is only shared on a need to know basis. However, when considering moving personal data to electronic or hard copy archive, we will have regard to the Guideline Retention Periods and only archive what is really necessary. We will consider whether we could delete the personal data instead. If we do archive personal data, we will ensure that we delete remaining versions/copies.

Requests for erasure

If we receive a request to erase personal data, we will immediately refer the request to the Data Protection Champion(s) for guidance.

Appendix: Guideline Retention Periods for Customer and Suppliers Personal Data

Specific type of personal data	Guideline Retention Period	Additional information / explanation	Location of personal data
Customer contact details; email ID, phone number, postal address	Data shall not be kept for longer than is necessary for that purpose or those purposes required to carry out our contractual obligations	For example our AS9100 certification requires us to keep PO/Purchase instructions to Vendor for 5 years. Some customers require a longer duration of retention.	Our MRP, CRM and accounts database systems
Suppliers contact details; email ID, phone number, postal address	Data shall not be kept for longer than is necessary for that purpose or those purposes required to carry out our contractual obligations	For example our AS9100 certification requires us to keep Vendor Record Files (Including assessment visit notes) (Period after removal as approved) 7 years	Our MRP and accounts database systems