

# **Retention & Archiving Policy**

Mathematics Recovery has a responsibility to look after the personal data we collect, including information about our members, employees, event attendees and people browsing our websites. As outlined in our Data Protection Policy, personal data will only be retained for as long as is necessary and destroyed or anonymised when no longer required. Therefore, it is vital we maintain clear and specific policies and procedures in regard to the retention, archiving and destruction of personal data.

Personal data can only be retained beyond the retention period outlined in this policy with the written approval of our Data Protection Officer (DPO) in line with the General Data Protection Regulation (GDPR).

If a user is found to have breached this policy, they may be subject to our disciplinary procedure. If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s). If you do not understand the implications of this document and how it may apply to you, seek advice from the DPO.

#### Definitions

Archiving	A process of moving data that is no longer actively used to a separate storage
	device for long-term retention.
Data subject	Any living person who is the subject of personal data (see below for the definition
	of personal data) held by an organisation. A data subject must be identifiable by
	name, ID, address, online identifier or other factors such as physical,
	physiological, genetic, mental, economic, or social.
Destruction	The process of destroying data, either in hard copy or electronic format, so that it
	is completely unreadable and can no longer be accessed or used.
Personal data	Any information relating to a data subject.
Retention	The continued storage of data for compliance or operational reasons.

### **Retention Policy**

The DPO will determine how long data is required and define the time periods for which personal data records should be retained, deleted or archived within the Retention Schedule of this document. If a category of personal data is not specified within this policy, the retention period will be deemed to be 3 years from the date of creation or acquisition. The DPO will annually review the data we hold and update the Retention Schedule as appropriate.

### **Archiving Policy**

Under GDPR, we can process personal data for archiving purposes beyond the stated retention period if doing so is in the public interest, or for historical, scientific or statistical purposes. We ensure that archiving does not contravene the rights and freedoms of data subjects and that appropriate technical and organisational safeguards are in place, such as data minimisation, pseudonymisation or encryption.

### **Destruction Policy**

The DPO oversees and documents the destruction of personal data in accordance with the Retention Schedule. The Information Security Policy & Procedures enforce a list of approved destruction methods.

### Litigation

We may be legally required to retain personal data beyond stated retention periods to comply with ongoing investigations, litigation or other legal proceedings until any dispute is fully resolved and no longer open to appeal. If you are aware of any anticipated or existing litigation, you should notify our DPO, so they can suspend any deletion or minimisation of personal data.

### **Data Stored**

Mathematics Recovery stores the following information about its members:

Personal Details		
Names	Disabilities – Yes/No	Accessibility Req. – Yes/No
	Dietary Requirements	, i
Contact Details		
Postal Address(es)	Telephone Number(s)	Email Address(es)
Twitter Handle		
Employment Details		
Job Title Professional	Employer Details	
Membership(s)	Accreditation	
Membership Details		
Record of Payments	Event attendance	



## **Retention Schedule**

Personal Data Record	Retention Period	Archiving Notice
Membership data		
MR membership data and application forms for Full Members and Retired Members	3 years after membership lapsed Names of new members are published on website as matter of public record, so these are permanent.	After retention period, records are pseudonymised, and remaining fields are either minimised to retain aspects of historical or statistical importance, aggregated then deleted (particularly special category data) or deleted completely.
	If membership not taken up within 3 months of acceptance, all these data are destroyed.	
Disciplinary Action or Complaints Against a Member	Retained for the duration of the sanction	After retention period, case details are retained but individual and company records are pseudonymised to prevent identification of the data subject
Letters	Up to 6 months, with exception of letters of historic significance.	Letters of historical significance are archived in accordance with the archiving policy

Event data		
Physical Booking Forms – Delegates	2 years after event	
	For conferences, the names of attendees are published in delegate pack, so these details will be permanent	Names stored as public record
Physical Booking Forms – Exhibitors	2 years after event	
	For conferences, the names of exhibiting attendees and organisations are published in the delegate pack and on our websites, so these details will be permanent	Names stored as public record
Physical Contact Lists	2 years after last consent	N/A
Speaker Information	For conferences, the names, pictures, biographies and talk summaries of speakers are usually published in the delegate pack and on our websites, so these details will be permanent	Names, pictures, biographies and talk summaries stored as public record



Delegate Information Stored on our Database (Online Bookings)	For members, these data are retained in line with the retention period for MR membership data For non-members, these data are retained for 3 years after event	N/A
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IT records		
Recycle Bin	End of month	N/A
Downloads	End of month	N/A
Inbox	<ul> <li>5 years after year end for emails with attachments containing personal information, subject to exemptions:         <ul> <li>Any email sent to the generic mathsrecoveryuk20@gmail.com are deleted 3 years after year end</li> <li>any Emails containing event booking forms, which are deleted 3 years after year end</li> </ul> </li> </ul>	Inboxes may be archived and encrypted upon termination of an MR employee's contract where it is suspected that vital information may be stored and access may be required sometime in the future
Deleted Emails Folder	30 days	N/A
Spam Emails Folder	30 days	N/A
Google Drives	Reviewed quarterly, but documents containing personal information deleted in line with Inbox retention	Documents containing personal information may be archived on an ad-hoc basis in line with our Archiving Policy
Local Drives	Reviewed quarterly, but documents containing personal information deleted in line with Inbox retention	Documents containing personal information may be archived on an ad-hoc basis in line with our Archiving Policy
Shared Networks	Reviewed annually, but documents containing personal information not referenced elsewhere deleted 3 years after year end	Documents containing personal information may be archived on an ad-hoc basis in line with our Archiving Policy
Operating System and Application Logs	3 years from end of year of event	N/A



Surveys	3 years after the year end of the survey	After retention period, records are pseudonymised, and remaining fields are either minimised to retain aspects of historical or statistical importance, aggregated then deleted (particularly special category data), or deleted completely
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Financial Records		
Payroll Records	7 years from end of fiscal year	N/A
Chart of Accounts	Permanent	N/A
Financial Procedures	Permanent	N/A
Permanent Audits	Permanent	N/A
Financial Statements	Permanent	N/A
Membership Payments	7 years from end of fiscal year	N/A
(name, amount, date,		
cheque/account number)		
Invoices	7 years from end of fiscal year	N/A
Bills and Expenses	7 years from end of fiscal year, unless it is a fixed asset which	N/A
	has a longer expected lifetime	
Bills for Fixed Assets with	Until end of fiscal year for the expected lifetime period	N/A
7+ Year Lifetime		
Credit Card Purchases	7 years from end of fiscal year	N/A
Card Payment Details	1 year and 10 days	N/A
(account name, encrypted		
PAN, expiry date, bank		
name and card type)		



Business Records		
Board Meeting Minutes	Permanent	
Annual Report	Permanent	
Signed Contracts	Permanent	
Complaints	Permanent	

HR Records		
Employee/Trustee Name, Roles and Dates	Permanent	Names and posts stored as internal record
Employee/Trustee Personal Details including Contact Details, National Insurance Number, Bank Details,	Duration of employment	N/A
Health and Safety Records	As per legal requirement	N/A
Disciplinary Records, Appeals or Other Legal Proceedings	As per legal requirement	N/A
Contractor Records	Duration of contract	Names and posts stored as internal record
Trustee, Chair and Committee Member Details	Names and posts are permanently retained; other details are removed on resignation, or retained in line with our normal membership retention policies (if a member)	Names and posts stored as public record
Trustee and Committee Member Applications	Up to the end of their appointment	N/A
AGM Proxy Votes	1 year after AGM took place	N/A



Publications		
Journal Author Details	Permanent	Public record
Online Content Author Details	Permanent	Public