



DATA STORAGE POLICY



MONARCH PARTNERSHIP
Utilities simplified

DATA RETENTION/STORAGE POLICY

Introduction

The Monarch Partnership Limited (“The Monarch Partnership”) is committed to the protection of personal data and compliance with the Data Protection Act 1998 (“DPA”). The Monarch Partnership also wishes to establish an internal policy for the retention and storage of its data, documents and other electronic records as part of its business practices. This Data Retention/Storage Policy sets out the policy and procedures in relation to which The Monarch Partnership will deal with the retention of any personal data held by it (as a data controller or otherwise) in connection with the DPA and on how data, documents and others records are classified and retained. References to “Personal Data” in this Policy is to personal data as defined under the DPA. Therefore, there maybe other documentation used within The Monarch Partnership’s business which do not contained ‘Personal Data’ and will therefore be dealt with in a different manner, e.g, commercial contracts and company specific information (which will be dealt with in accordance with Companies Act legislation). This Policy sets out the different approach to each type of data collected, used and stored within the business and how this will be dealt with.

Personal data

In accordance with the 5th Data Protection Principle under the DPA, The Monarch Partnership will not retain records (in electronic and/or hard copy format) containing Personal Data for any longer than is necessary for the purpose or purposes for which that data has been collected. Records containing Personal Data will be reviewed and, if necessary, transferred to alternative records for longer retention periods if deemed appropriate by The Monarch Partnership. Such records will be kept for no longer than is necessary for that purpose. For example, if documents may be required in support of potential or actual legal proceedings, then such documents may need to be retained for a period of up to 6 years in order to deal with any such business risk. However, it is unlikely that any Personal Data will be held for longer than this period unless this is reasonably necessary for a particular purpose of the business.

Other Types of Data

Data would be retained by The Monarch Partnership for different periods, depending on the type of data or information contained within a particular document (including emails). The Monarch Partnership reserves the right to amend this Policy at any time following the review of updates or amendments to data protection legislation and different technologies that may need to be considered when looking at how data and information is communicated to The Monarch Partnership and for storage purposes. However, The Monarch Partnership aims to retain the different types of data listed below for the following periods:

1. General enquiries and correspondence will generally be retained for a period of 6 months from date of enquiry/correspondence.
2. Details relating to performance of services for clients, using data supplied by clients and other suppliers, will generally be retained for a period of 6 years following the end of the relationship with that client, depending on the arrangements with specific clients and whether a shorter or longer period may be appropriate.
3. Marketing information will generally be kept for a period of 6 months, although will be destroyed when no longer required.
4. Contacts databases and lists – contacts will be deleted either upon request made to The Monarch Partnership or when no longer required by The Monarch Partnership. Generally, contacts would be deleted after a period of 2 years of no further correspondence with that contact.
5. Contractual documentation which may make reference to matters in relation to Personal Data will be kept for a period between 2-6 years, depending on references made within the documentation to any Personal Data. If contracts are executed as Deeds, then the documentation relating to that contract will be kept for a period of 12 years from the end of that contract.

6. Details relating to any complaints made against The Monarch Partnership's services or service performance and/or use of Personal Data will generally be kept for a period of 6 years before it is destroyed.

7. Data relating to actual or potential litigation will be kept for a minimum period of 6 years.

8. If any tender response or contract requires The Monarch Partnership to retain data relating to that tender or contract for a longer period, then this shall be communicated to those involved in that tender and/or contract and the data shall be kept for a suitable longer period, as determined by the tender and/or contract and The Monarch Partnership's obligations under the tender and/or contract and to any other connected third party.

Compliance with the Policy

All employees of The Monarch Partnership are required to adhere to this Policy, in order for The Monarch Partnership to manage a suitable business practice in the retention, storage and destruction of the information it collects and holds, as well as to ensure that it is satisfying its legal obligations, particularly in relation to the DPA. Suba Sandhu shall be the Data Compliance Manager and any queries about this Policy, or if you consider that the Policy has not been followed in respect of personal data about yourself or others, then you should contact the Data Compliance Manager and provide details.

Employee data

The types of information in this category that The Monarch Partnership handles includes details of current, past and prospective employees. Such information may be held in hard copy or electronically and will be collected, stored and used in compliance with the DPA. Personal data held about current, past and prospective employees shall be stored securely and shall only be accessed by authorised personnel.

Archive/Destruction

Data, information and records stored by The Monarch Partnership (including correspondence and relevant emails) shall be stored either in hard copy within the office (if appropriate) or a suitably selected storage facility, or shall be stored electronically on The Monarch Partnership's internal computer systems and/or with external third party electronic storage providers. Once the retention period relating to the type of data has been reached (as highlighted above), the records containing that data will be reviewed by The Monarch Partnership. If the record is no longer required, then the record will be destroyed by The Monarch Partnership. However, if following the review process there remains exceptional circumstances where records maybe needed for a further retention period, then the subsequent retention period will be noted on that record or information by The Monarch Partnership accordingly. Commercially sensitive documents, or those which contain confidential information, Personal Data or have other security information contained within them, need to be disposed of carefully and securely. Disposal methods for hard copy documents are shredding and placing within the confidential waste bins. Electronic documents should be destroyed and confidential information contained within them needs to be overwritten to make it unreadable. Sensitive personal data must be completely erased from electronic document files. Records which are due for destruction and approved to be destroyed by The Monarch Partnership will be destroyed promptly and in accordance with appropriate regulations once that retention period has expired. This is in order to ensure compliance with the DPA for not holding Personal Data for longer than is necessary and for the effective management of document storage of the business.

This Policy is applicable as from October 2009 and is subject to amendment at any time. Any breach of this Policy will be taken seriously and may result in disciplinary action if an employee of The Monarch Partnership deliberately or negligently processes and/or destroys data in contravention of this Policy.



MONARCH PARTNERSHIP

Utilities simplified

THE MONARCH PARTNERSHIP

MONARCH HOUSE
7-9 STAFFORD ROAD
WALLINGTON,
SURREY
SM6 9AN

T: 020 8835 3535

F: 020 8835 3536

www.monarchpartnership.co.uk
marketing@monarchpartnership.co.uk

The Monarch Partnership Ltd
registered in England
(Reg No 4346309).
VAT Reg No: 793 6132 10.