

## **RETENTION OF DOCUMENTS GUIDE**

These guidelines support the Highland Industrial Supplies Ltd Data Protection Policy.

The guidelines are intended to ensure that the Company processes (including deletion, erasure and destruction) personal data in the form of client records in accordance with the personal data protection principles.

The Data Protection Officer (DPO), Yvonne Brown, Director is responsible for overseeing these guidelines and any questions about the operation of the guidelines should be directed to her.

### **GENERAL PRINCIPLES ON RETENTION AND ERASURE**

The Company's approach to retaining customer/ supplier records is to ensure that it complies with the data protection principles referred to in these guidelines and is risk assessed, in particular to ensure that:

- Customer/ Supplier records are regularly reviewed to ensure that they remain adequate, relevant and limited to what is necessary to facilitate the servicing of our/ your contract/ account with us/ you.
- Customer/ Supplier records are kept secure and are protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Where appropriate the Company uses anonymization to prevent identification of individuals.
- When records are destroyed, whether held as paper records or in electronic format, the Company will ensure that they are safely and permanently erased.

### **RETENTION AND ERASURE OF CUSTOMER/ SUPPLIER RECORDS**

The Company has regard to recommended retention periods for particular financial records set out in legislation, referred to in the table below. However, it also has regard to legal risk and may keep records for up to six<sup>1</sup> years (and in some instances longer) after the contract with the Company has ended/ your account has closed and there is a lawful reason to do so.

#### **TYPE OF RECORD**

##### **Payment records**

Current bank details

Bank details will be deleted **as soon after the account is closed** once final payments have been made.

Payment history

These must be kept for at least **6+1 years** after the end of the tax year to which they relate.

##### **Customer/ supplier records**

References

Records will be deleted as soon payment history for the account has been established.

Credit check results

Records will be deleted as soon payment history for

	the account has been established.
Invoices	These must be kept for at least <b>6+1 years</b> after the end of the tax year to which they relate.
Purchase Orders	These must be kept for at least <b>6+1 years</b> after the end of the tax year to which they relate.
Complaints/ feedback	1+ current year.
<b>Legal action</b>	
Pre court letters	Records will be deleted as soon after the account is closed once final payments have been made.