

POLICY AF
RETRIEVAL, ARCHIVING AND DESTRUCTION POLICY

| Owner | Next review date | Review completed | Reviewed by |
|-------------------------|------------------|------------------|-------------|
| Data Protection Officer | | | |
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| Amendment date | Amended by | Reference for amendment (para, line) |
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1.1 Purpose

This Policy is designed to provide an overview for retrieval, archiving and destruction of data and records held by Cognisco and to ensure that they are held in line with the relevant legislation and codes of practise. A separate policy is in place for client records.

1.2 Records Retrieval

1.2.1 Current Employees

Current employees are entitled to see their records at any time under the Data Protection Act. Any request for records to either Finance, Legal or HR must be processed within 40 calendar days.

Employees may be asked to put the request in writing (email from a work account is acceptable).

A log of records requested should be kept and employees should be advised of this.

Any information removed from an employee's file must be logged on a card kept attached to the front of the file.

1.2.2 Managers Requesting Information on Employees

Managers may request to see information on employees but should not be given access to the full file as other personal records such as bank account details may be held here.

The HR department may pass information to managers (photocopied or removed from file and logged). Information that may be shared includes references, salary, appraisals and CVs.

1.2.3 Previous Employees or Their Representatives

Where requests from previous employees or their representatives are received they should be handled in line with the Data Protection Policy.

All requests will be logged and the Data Protection Officer should be notified by email, as should the CEO and the Legal department.

A log of any information sent will be kept on the employees file.

Information may be sent electronically but only after confirmation from the Data Protection Officer that this is appropriate. Confirmation must be in writing and a copy kept with the file. An email is acceptable.

Information sent in hard copy must either be collected by the previous employee or their representative (who must supply ID such as a passport or driving licence and sign for the records before they are supplied) OR sent via a courier at the expense of the previous employee via a service selected by Cognisco.

I.3 Records Archiving and Destruction

I.3.1 Records Management Policy

The Records Management Policy sets out retention dates for general documents held and provides a general overview for the setting of retention dates for records.

I.3.2 Data Archiving

Records may be archived in line with the Data Protection Policy and Records Management Policy.

I.3.2.1 Electronic Records

Electronic records should be archived in line with the requirements of the Client Data Management Policy.

I.3.2.2 Hard Copy Records

Hard copy records should be held securely with a review or destroy date listed. An entry should be made into the HR calendar to ensure the records are reviewed or destroyed at this point.

I.3.3 Destruction

I.3.3.1 Electronic Records

Electronic records should be destroyed in line with the requirements of the Client Data Management Policy with testing carried out to ensure they have been removed.

Tests should ensure that records have been searched for (for example with an email it should be searched for under the title of the email to ensure it has been removed).

Technical support should be sought if appropriate.

I.3.3.2 Hard Copy Records

Hard copy records should be shredded and disposed of as per normal.