

Data Retention Policy

Finding Your Feet’s Data Retention Policy is a tool to ensure all business information is retained for only as long as required. It takes account of the context within which the charity operates, including the legal and regulatory environment, for example compliance with the fifth data protection principle, and the expectations of stakeholders. It is intended primarily as a resource for those responsible for processing data and to enable the disposal activity to be carried out in a consistent and controlled manner.

The charity collects, processes and stores different categories of data. Each category has its own retention period which applies to all records in that category and to all formats: paper and electronic. The data retention period will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods. If individual records or documents require an alternative retention period, this must be agreed with Charity Manager in advance of any change and the reasons are to be noted and retained with the data.

The schedule below outlines the retention periods for each different category of data and the appropriate disposal activity.

Category of Data	Details	Retention Period	Disposal Activity
Service Users ('Troopers')	Sensitive, personal data and sometimes relating to minors, necessary to provide follow up	Electronic: indefinitely Paper: 2 years	Paper: professionally shred Electronic: n/a
Fundraisers	Names, addresses and/or email addresses	2 years then refresh consent. For Gift Aid compliance: 6 years	Paper: professionally shred Electronic: anonymise
Donors	Names, email addresses, addresses	2 years then refresh consent For Gift Aid compliance: 6 years	Paper: professionally shred Electronic: anonymise
Contact Forms (from website)	Names, email addresses, addresses	2 years	Paper: n/a Electronic: delete
Event Attendees (from website)	Name, email address, addresses	2 years	Paper: n/a Electronic: delete
Emails	Names, email addresses, addresses	2 years	Paper: n/a Electronic: delete



E-Newsletter Subscribers	Names, email addresses	Opt-in required	Electronic: Opt-out to unsubscribe
Online purchases	Names, email addresses, addresses, credit card details (via secure provider)	2 years then refresh consent	Paper: professionally shred Electronic: anonymise
Incoming Telephone Calls	Names, addresses, email addresses, telephone numbers	2 years	Paper: professionally shred Electronic: n/a

Published: May 2018