Data Retention

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1. Introduction

This Policy sets out the obligations of Pioneer Quality Services Limited, a company registered in England and Wales under number 3399911, whose registered office is at 12 Dover Street, Canterbury, Kent, CT1 3HD ("the Company") regarding retention of personal data collected, held, and processed by the Company in accordance with the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018.

The UK GDPR defines "personal data" as any information relating to an identified or identifiable living individual (a "data subject"). An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.

The UK GDPR also addresses "special category" personal data (also known as "sensitive" personal data). Such data includes, but is not necessarily limited to, data concerning the data subject's race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the UK GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the UK GDPR to protect that data).

In addition, the UK GDPR includes the right to erasure or "the right to be forgotten". Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

a) Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
b) When the data subject withdraws their consent;
c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
d) When the personal data is processed unlawfully (i.e., in breach of the UK GDPR);
e) When the personal data has to be erased to comply with a legal obligation; or
f) Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Company. Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g., by completing a contact form), or because it is in our legitimate interests.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

1. Data will be held for the lifetime of the contract.
2. For job applications, sensitive information and personally identifiable information will be deleted after three months.

For further information on other aspects of data protection and compliance with the UK GDPR, please refer to the Company's Data Protection Policy.

2. Aims and Objectives

2.1 The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the UK GDPR.

2.2 In addition to safeguarding the rights of data subjects under the UK GDPR, by ensuring that the Company does not retain excessive amounts of data, this Policy also aims to improve the speed and efficiency of managing data.

3. Scope

3.1 This Policy applies to all personal data held by Pioneer Quality Services Limited.

3.2 Personal data, as held by Pioneer Quality Services Limited, is stored in the following ways and in the following locations:

a) The Company's servers, located in Head Office, The Stable, The Cattle Yard, Manston, Kent, CT12 5FQ and located on OneDrive.

b) Computers permanently located in the Company's premises at The Stable, The Cattle Yard, Manston, Kent, CT12 5FQ.

c) Laptops, computers and other mobile devices provided by the Company to its employees.

d) Physical records stored in the head office lockable filing cabinet.

4. Data Subject Rights and Data Integrity

All personal data held by the Company is held in accordance with the requirements of the UK GDPR and data subjects' rights thereunder, as set out in the Company's Data Protection Policy.

4.1 Data subjects are kept fully informed of their rights, of what personal data the Company holds about them, how that personal data is used as set out in Parts 12 and 13 of the Company's Data Protection Policy, and how long the Company will hold that personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).

4.2 Data subjects are given control over their personal data held by the Company including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict the Company's use of their personal data, the right to data portability, and further rights relating to automated decision-making and profiling as set out in Parts 14 to 18 of the Company's Data Protection Policy.

5. Technical and Organisational Data Security Measures

5.1 The following technical measures are in place within the Company to protect the security of personal data. Please refer to Parts 20 to 24 of the Company's Data Protection Policy for further details:

a) All emails containing personal data must be encrypted.

b) All emails containing personal data must be marked "confidential".

c) Personal data may only be transmitted over secure networks.

d) Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative.

e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself and associated temporary files should be deleted.

f) Where personal data is to be sent by facsimile transmission the recipient should be informed in advance and should be waiting to receive it.

g) Where personal data is to be transferred in hard-copy form, it should be passed directly to the recipient or sent using registered post. All personal data transferred physically should be transferred in a suitable container marked "confidential".

h) No personal data may be shared informally and if access is required to any personal data, such access should be formally requested from the Data Protection Manager.

i) All hard copies of personal data, along with any electronic copies stored on physical media should be stored securely.

j) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation.

k) Personal data must be handled with care at all times and should not be left unattended or on view.

l) Computers used to view personal data must always be locked before being left unattended.

m) No personal data should be stored on any mobile device, whether such device belongs to the Company or otherwise without the formal written approval of the Data Protection Manager and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.

n) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the Company's Data Protection Policy and the UK GDPR.

o) All personal data stored electronically should be backed up regularly with backups stored offsite. All backups should be encrypted.

p) All electronic copies of personal data should be stored securely using passwords and encryption.

q) All passwords used to protect personal data should be changed regularly and must be secure.

r) Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords.

s) All software should be kept up to date. Security-related updates should be installed as soon as reasonably possible after becoming available.

t) No software may be installed on any Company-owned computer or device without approval.

u) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Data Protection Manager to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the Telephone Preference Service (TPS).

5.2 The following organisational measures are in place within the Company to protect the security of personal data. Please refer to Part 25 of the Company's Data Protection Policy for further details:

a) All employees and other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the UK GDPR and under the Company's Data Protection Policy.

b) Only employees and other parties working on behalf of the Company that need access to, and use of, personal data in order to perform their work shall have access to personal data held by the Company.

c) All employees and other parties working on behalf of the Company handling personal data will be appropriately trained to do so.

d) All employees and other parties working on behalf of the Company handling personal data will be appropriately supervised.

e) All employees and other parties working on behalf of the Company handling personal data should exercise care and caution when discussing any work relating to personal data at all times.

f) Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.

g) The performance of those employees and other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.

h) All employees and other parties working on behalf of the Company handling personal data will be bound by contract to comply with the UK GDPR and the Company's Data Protection Policy.

i) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of the Company arising out of the UK GDPR and the Company's Data Protection Policy.

j) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under the UK GDPR and/or the Company's Data Protection Policy, that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

6. Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

6.1 Personal data stored electronically (including any and all backups thereof) shall be deleted securely using appropriate non-recoverable software tools.

6.2 Personal data stored in hard-copy form shall be shredded to at least the standard of BS EN 15713:2023 and recycled.

7. Data Retention

7.1 As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

7.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

7.3 When establishing and/or reviewing retention periods, the following shall be taken into account:

a) The objectives and requirements of the Company.

b) The type of personal data in question.

c) The purpose(s) for which the data in question is collected, held, and processed.

d) The Company's legal basis for collecting, holding, and processing that data.

e) The category or categories of data subject to whom the data relates.

7.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

7.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

8. Roles and Responsibilities

8.1 The Company's Data Protection Manager is contactable via email: enquiries@pioneerqs.uk.

8.2 The Data Protection Manager shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with the UK GDPR and other applicable data protection legislation.

8.3 The Data Protection Manager shall be directly responsible for ensuring compliance with the above data retention periods throughout the Company. Any questions regarding this Policy, the retention of personal data, or any other aspect of UK GDPR compliance should be referred to the Data Protection Manager.

9. Implementation of Policy

This Policy shall be deemed effective as of 25th May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name	Mr Martin J Funge
Position	Director
Date	1st October 2025