

Data Retention Policy

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Template Revision History:

Version	Date	Description	Author	Reviewer & Approver
1.0	23-Jan-23	Documentation standards to be followed for Word. This in turn shall be used to create standard accelerators subsequently.	Marissa Dorros, Rosina O'Brien, Rajendra Gupta	Caroline Silva, Rick Miller

Document Revision History:

Version	Date	Description	Author	Reviewer & Approver
2.0	21-Sep-2019	This document details the data retention policy & guidelines for the management and employees	Bipin Pendyala	Reviewers: Naveen Agarwal, Steve Coxhead Approver: Arun Bala
3.0	13-Apr-2023	<ol style="list-style-type: none"> Active Kill Disk tool to remove obsolete data permanently to satisfy NIST-800- 88 requirements. Applied new company's documentation standards 	Radhika Joshi/ Gagan Ahuja	Reviewer: Rajendra Gupta, Approver Kaushal Jora
4.0	21-March-2025	Revised Record Retention Schedule Data Deletion Process	Amrita Thakur Alekhya Kurmagadda	Reviewer: Supriya Chakrabarty Approver: Naveen Agrawal, Kathleen Quilter

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1. PURPOSE AND SCOPE

- 1.1 Invenio Business Solutions Limited (the “Company”) collects and processes personal data relating to our current, past and prospective workforce. The Company also collects and process a range of personal data relating to its customers, clients, suppliers and other business contacts. We recognize the need to treat that information in an appropriate and lawful manner and are committed to protecting the privacy and security of individuals’ personal data.
- 1.2 There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.
- 1.3 Personal data is any information identifying a living individual or information relating to a living individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special categories of personal data such as health data and pseudonymized personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
- 1.4 This Data Retention Policy and the attached Record Retention Schedule detail how long we typically retain each type of documentation that is likely to contain personal data. Such retention periods are subject to the exceptional circumstances set out below, for example where we require the information to be retained for actual or anticipated litigation or in compliance with specific laws or regulations.
- 1.5 This policy should be read alongside our Data Protection Policies and relevant Privacy Notices which detail how we collect and use personal information and the lawful bases on which we process such information.
- 1.6 This policy covers all personal data that we hold or have control over. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings.
- 1.7 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. GUIDING PRINCIPLES

Through this policy, and our data retention practices, we aim to meet the following commitments:

- We comply with legal and regulatory requirements to retain data.
- We comply with our data protection obligations, in particular to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle).
- We handle, store and dispose of data responsibly and securely.
- We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reasons.
- We allocate appropriate resources, roles and responsibilities to data retention.
- We regularly remind employees of their data retention responsibilities.
- We regularly monitor and audit compliance with this policy and update this policy when required.
- We do not take any responsibility for Data or its Protection other than as stated herein.
- The sole purpose of this policy is to mitigate the risk of Digital Data Storage and Retention

3. ROLES AND RESPONSIBILITIES

Responsibility of all staff. We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. All staff members must comply with this policy, the attached Record Retention Schedule, any communications suspending data disposal and any specific instructions relating to data retention. Failure to do so may subject us, our employees, and contractors to serious civil and/or criminal liability. An employee's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination. If any other (non-employee) member of staff fails to comply with this policy the Company may decide to stop providing that member of staff with work or terminate their contract with the Company immediately and without notice or compensation. It is therefore the responsibility of everyone to understand and comply with this policy.

A staff member cannot claim immunity for failure to make oneself aware of local laws be it Data Protection or implied contract.

4. RETENTION PERIODS

- 4.1 Data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). The attached Record Retention Schedule sets out the data retention period applicable to the different types of documents containing personal data that the Company is likely to hold. Where data is listed in the attached Record Retention Schedule, we have taken into account the principle of storage limitation and balanced this against our requirements to retain the data.
- 4.2 If a type of document contains personal data and is not listed in the Record Retention Schedule, please discuss this with your line manager in the first instance.
- 4.3 **Preservation of documents for contemplated litigation and other special situations.** We require all staff to comply fully with the attached Record Retention Schedule. However all staff should note the following general exception to any stated destruction schedule: If you believe, or a member of senior management informs you, that certain records are relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until the CTO determines those records are no longer needed. Preserving documents includes suspending any requirements in the Record Retention Schedule and preserving the integrity of the electronic files or other format in which the records are kept.
- 4.4 In addition, you may be asked to suspend any routine data disposal procedures in connection with certain other types of events, such as our merger with another organisation or the replacement of our information technology systems.
- 4.5 If you have any questions about this policy, please contact the CTO.

5. DELETION OF RECORDS

5.1 We used Active Kill Disk tool to remove obsolete data permanently in accordance with NIST-800-88 requirements.

5.2 In SharePoint, deleted items initially go to the site recycle bin, and if deleted from there, they move to the site collection recycle bin where they remain for a period of 93 days. After 93 days, data is permanently erased from both recycle bins and cannot be retrieved. – this action will be carried out by the IT team.

5.3 HRMS data will be deleted by the HR-OPS team manually

6. RECORD RETENTION SCHEDULE

Type of Document	Retention period
HR Data	
Recruitment records	Six months after notifying candidates of the outcome of the recruitment exercise.
Immigration checks	Three years after the termination of employment.
Contracts	Employee documentation will be stored for 8 years after their exit. Post which the employee personal detail received from the employee at the time of joining will be deleted, retaining only their employment records during their tenure in Invenio in an archived state..
Payroll, wage and benefits records	Eight years after employment ends.
Current bank details	Bank details will be deleted as soon after the end of employment as possible once final payments have been made.
PAYE records	Eight years after employment ends.
Records in relation to hours worked and payments made to workers	Eight years after employment ends.
Personnel records	Reposited for eight years after employment ends.
Records in connection with working time	Four years after the relevant period.
Employment Records – (Employee Life Cycle History)	Maintained for a continuous period in an archived state. - Accessible only by HRMS super admins. The underlined purpose for retaining employee lifecycle history – <ul style="list-style-type: none"> Employee Rehire Eligibility (To understand employee's performance during the associated period) Employee requests for Offer Letter/separation letter Request for Professional reference letter Ex-employee verifications from third-party vendors
Accident records	For at least four years from the date the report was made.
Corporate and Financial Data	
Register of members	Entries for former members can be removed 10 years after the date they ceased to be members.

Register of directors	Names retained indefinitely for historical purposes. Remaining personal details and addresses removed after 8 years.
Accounts records	8 years.
Office Data	
CCTV recordings and images	30 days or as long as necessary for any investigations or claims that arise.
Visitor logs	6 months.
Client and Supplier Data	
Marketing database records	Once consent is withdrawn or 2 years from last contact.
Client Information	7 years from last contact.
Project data including technical documentation	While engagement continues and for seven years after the contract ends.
Evidence of consent to marketing (including electronic marketing)	When consent expires or is withdrawn.
Website analytics information	2 years.
Client complaints handling	7 years from settlement or closure.
Supplier Information	7 years from last contact.
IT Records	
Email, different storage drives, a document management system, hard copy file storage etc.	Emails – 10 years OneDrive, SharePoint storage – 10 years