

Analyze Data Retention and Destruction Policy

POPIA Compliance

Version: 1.0

Issued: 25 June 2021

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Document control

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History	Issue	Date	Author
First draft for review	V0.1	18 June 2021	Amanda Budler
First version	V1.0	25 June	Amanda Budler

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1 Scope

Personal information is defined as information relating to an identifiable, living natural person and where it is applicable, an identifiable juristic person (sole proprietors, companies, CC's etc). This information includes, but is not limited to:

- Contact details: email, telephone, addresses, online identifiers
- Age, sex, race, birth date, ethnicity, ID number, marital status, any identifiable content
- Personal opinions, views or preferences
- History regarding medical, blood type, employment, financial, educational, criminal, biometric information, video / voice recordings
- Confidential personal and business correspondence

Analyze stores and uses personal information (PI) across various processes. Disposal is necessary not only to reduce administrative burdens but also to ensure that information is not retained for longer than necessary and that accurate records are maintained for appropriate periods to satisfy applicable operational and legal requirements.

This is policy required to comply with our obligations under the Data Protection Act of 2018 which requires that the following principles must be applied to PI:

- PI collected is adequate, relevant and limited to what is necessary.
- PI collected is accurate and where necessary kept up to date.
- PI is kept for no longer than is necessary for its purpose.

Analyze collects PI from individuals or entities in the processes listed below:

- Employee/candidate personal information:
 - Recruitment of new staff
 - Onboarding of new staff
 - Documenting and sharing of employee professional profiles
 - Compliance reporting e.g. SETA
- Client personal information:
 - Making contact for sales discussions
 - Documenting of project meetings (recordings)
 - Documenting of project deliverables
- Third party personal information:
 - Making contact for procurement discussions
 - Invoicing clients

All functional areas or processes that collect, use, or retain PI will be managed by this policy to ensure:

- Records of personal information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed.

- The destruction or deletion of a record of personal information must be done in a manner that prevents its reconstruction in an intelligible form.
- Records of personal information may be retained for periods more than those contemplated for historical, statistical or research purposes if the responsible party has established appropriate safeguards against the records being used for any other purposes.

2 Retention of Personal Information

When defining retention periods, the following was considered:

- Retention periods should reflect the longer of the legal and operational value of the records. The justification for the retention periods, legal or operational, should be documented.
- A retention schedule and policy should be viewed as dynamic.
- The retention schedule should be reviewed periodically.
- Retention periods are determined based upon the nature of the information held, not the medium in which it is maintained. This means that PI which is held in a digital format should only be retained for the same period as it would be kept if it were in paper form.
- Retention arrangements for digital records should ensure that they will remain complete, unaltered, and accessible throughout the retention period.

The value of information tends to decline over time, so most records should only be retained for a limited period and eventually be destroyed. A recommended minimum retention period, derived from operational or requirements, is provided for each category of record in the Schedule and applies to all records within that category.

During their retention period, operational needs may require records to be held in separate locations and on different media, but they should always be effectively managed in accordance with this policy.

DATA TYPE	STORAGE LOCATION	RETENTION PERIOD	ACTION & PURPOSE
Employee Personal Information	<ul style="list-style-type: none"> ▪ BambooHR ▪ Sharepoint ▪ NAS ▪ Intercode ▪ HR filing cabinet 	5 years	<ul style="list-style-type: none"> ▪ Retain all information for current employees ▪ If no longer an employee, retain if they are still a potential employee. Destroy all records if they are no longer a potential employee

DATA TYPE	STORAGE LOCATION	RETENTION PERIOD	ACTION & PURPOSE
Client Personal Information	<ul style="list-style-type: none"> HubSpot CRM Sharepoint / MS Teams NAS Bamboo HR Website Project Documentation 	10 years	<ul style="list-style-type: none"> Retain if they are an existing or potential client Destroy all records if they are no longer a potential client
	<ul style="list-style-type: none"> Workshop recordings 	1 year	<ul style="list-style-type: none"> Destroy as soon as the record is no longer required
Supplier Personal Information	<ul style="list-style-type: none"> Sharepoint Xero Filing cabinet 	5 years	<ul style="list-style-type: none"> Retain if they are an existing or potential supplier Destroy all records if they are no longer a potential supplier
Recruitment Candidate Personal Information	<ul style="list-style-type: none"> Bamboo HR NAS Sharepoint 	5 years	<ul style="list-style-type: none"> Retain if they are a potential employee Destroy all records if they are no longer a potential employee
	Interview packs	6 months	Destroy as soon as it has been stored electronically

Table 1: Retention periods

3 Destruction of Personal Information

Records should be reviewed as soon as possible after the expiry of the retention period.

A record should not be destroyed without verification that:

- No work is outstanding in respect of that record, and it is no longer required by any functional area.
- The record does not relate to any current complaint, investigation, dispute, or litigation.
- The record is unaffected by any current processes in the business.

A record will be made of all disposal decisions and destruction will be carried out in a manner that preserves the confidentiality of the record. Digital records must be deleted permanently from all sources and all copies of a record, in whatever format, must be destroyed at the same time. After deleting any records, proof of deleted data must be documented as part of the process.

Individuals (employees and clients) may request for their personal information to be deleted. All personal information relating to the individual must be sourced and deleted as per their request, with proof provided to them. If any personal information cannot be deleted for operational purposes, the individual must be informed of this together with the specific reason for the retention of the data.

4 Archiving and Retrieval of Personal Information

Analyze does not have a need to archive any data due to the nature of the business. The data collected and used within Analyze needs to be accessed directly and cannot be archived. There is no need to define a data retrieval process as all data is accessible directly from the source.

5 Maintenance and Review

Structures have been put in place to ensure that the Retention and Destruction policy is reviewed and maintained as needed. Roles and responsibilities have been outlined and agreed upon as per the table below.

ROLE		RESPONSIBILITY
Information Officer	COO	Accountable for overseeing privacy compliance for Analyze
Privacy Champions	<ul style="list-style-type: none"> Chief People Officer (Employee PI) Head of Sales (Lead/Client PI) COO (Client Project PI) Finance Clerk (Supplier PI) 	Ensures adherence to privacy standards. <ul style="list-style-type: none"> Retention schedule maintenance Disposal schedule maintenance Data classification and retention periods (PDI) maintenance Retention schedule ownership Effective evidencing of deletion

Table 2: Roles and responsibilities