

# Data Retention & Disposal Policy

## 1. Purpose

This policy defines how **CIDB Solutions Ltd** (“the Company”) retains, stores, and securely disposes of personal, financial, and business data in accordance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and HMRC record-keeping requirements.

The purpose is to ensure that all data is managed responsibly — retained only as long as necessary for legal, contractual, and operational reasons, and securely deleted when no longer required.

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## 2. Scope

This policy applies to all employees, contractors, and partners of CIDB Solutions Ltd who handle client or company data.

It covers all formats of data, including:

- Electronic files stored on **Linux servers**, encrypted drives, or the **in-house CRM**.
  - Physical documents and printed materials.
  - Backup data and archived copies.
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## 3. Legal & Regulatory Requirements

CIDB Solutions Ltd retains data in compliance with the following regulatory standards:

- **HMRC requirements:** Accounting and tax records must be kept for a minimum of **six (6) years** after the end of the financial period.
  - **Companies House:** Company records and accounts must be retained for at least **six (6) years** following their creation.
  - **UK GDPR & Data Protection Act 2018:** Personal data must not be kept longer than necessary for the purpose for which it was collected.
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## 4. Data Retention Periods

The table below outlines the standard retention periods applied by CIDB Solutions Ltd:

Data Type	Retention Period	Purpose / Notes
Client accounting & tax records	6 years minimum	Required by HMRC for audit and compliance.
Company formation and legal documents	Indefinite	Retained for legal and historical reference.
Payroll and PAYE data	6 years	Required under employment and tax law.
VAT records	6 years	As required by HMRC for VAT inspections.
AML verification data (ID, proof of address)	5 years after relationship ends	Required under the Money Laundering Regulations 2017.
Marketing or contact data	Until consent withdrawn or purpose fulfilled	Based on consent and legitimate interest.
Internal correspondence, emails, and reports	Up to 3 years	For operational reference and accountability.

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## 5. Data Storage & Security

All data is securely stored using **Linux-based encrypted servers** and the **CIDB Solutions proprietary CRM**. Access is strictly controlled through user permissions and multi-factor authentication. Backups are encrypted and stored in secure, access-controlled environments.

Physical documents, where applicable, are kept in locked cabinets accessible only to authorised personnel.

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## 6. Data Disposal Procedures

When data reaches the end of its retention period, it will be securely disposed of using the following methods:

- **Digital Data:** Secure deletion and overwriting using certified data destruction tools.
- **Physical Data:** Shredding or certified document destruction services.
- **Backup Data:** Encrypted archives are systematically purged as part of scheduled maintenance.

A **Data Disposal Log** is maintained to record all permanent deletions and destruction events.

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## 7. Breach & Non-Compliance

Failure to follow this policy may result in disciplinary action and potential legal consequences. Any accidental data retention or deletion incidents must be reported immediately to the **Data Protection Officer (DPO)**.

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## 8. Roles & Responsibilities

- **Data Protection Officer:** Oversees compliance, approves deletion schedules, and monitors implementation.
  - **IT & Systems Administrator:** Ensures secure deletion from digital platforms and backup systems.
  - **All Staff:** Must handle and dispose of data according to this policy.
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## 9. Review & Updates

This policy is reviewed annually, or sooner if required by law, changes in business operations, or updates in data protection regulations.

**Last Review Date:** 15/09/2025

**Next Review Due:** 15/09/2026

## 10. Approval

This policy has been adopted by the Board of Directors of CIDB SOLUTIONS LTD.

**Date:** 15/09/2025

**Signed:** Director/MLRO: Cozma Ioana Cristina

*Cozma Ioana Cristina*

**Date:** 15/09/2025

**Signed:** Director: Dan Butnarescu

*Dan Butnarescu*