

DATA RETENTION POLICY WITH SCHEDULE

This is the Data Retention policy of Patrick Stephen Limited

INTRODUCTION

We recognise that in the running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is held in both hard copy and electronic form. This policy covers all the personal data that we hold or have control over. It also covers data that is held by third parties on our behalf, for example cloud storage providers or offsite records storage.

AIMS OF THE POLICY

Our business will ensure that personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfill our statutory obligations and the provision of goods or/and services - as required by the data protection legislation, including the UK General Data Protection Regulation (UK GDPR).

RETENTION

This retention policy (with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

We will regularly monitor and audit compliance with this policy and update it when required.

DISPOSAL

We will ensure that personal data is securely disposed of when it is no longer needed.

The method of disposal should be appropriate to the nature and sensitivity of the documents concerned and includes:

1. Non-confidential records: place in waste paper bin for disposal
2. Confidential records: shred documents
3. Deletion of digital records
4. Transmission of records to an external body
5. Cloud storage

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The table below contains the retention period that we have assigned to each type of record. This 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.

APPENDIX 1

Type of Record	Retention Period	Where is it stored	Reason	Method of Deletion
Communication Details	1 year after last action	CRM	To communicate updates on orders, to request additional information or to address any requests for details	Removal from platform
Financial	1 year after last action	Cloud/Accounting Software	To enable billing of services performed	Removal from platform
Logos, Photos, Branding documents	1 year after last action	SharePoint	To store and retrieve for design projects	Removal from platform
Mailing Lists	1 year after last action	Cloud/CRM	To keep clients/customers informed of special deals, periods of closure and updates to the company	Removal from Cloud platform
Postal Address	1 year after last action	CRM	To deliver products ordered from the company	Removal from platform

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