

## **Document and Electronic Data Retention Policy**

### Introduction

This Retention (“Policy”) applies to FlexiSolar Ltd.

This Policy covers all records and documentation, whether paper or digital and are subject to the retention requirements of this Policy.

For the purpose of this Policy, the terms ‘document’ and ‘records’ include information in both hard copy and electronic form and have the same meaning hereby referred to as the Documents or Documentation.

In certain circumstances it will be necessary to retain specific records in order to fulfil statutory or regulatory requirements and to meet operational needs. Any retention of specific records should be retained under the retention period specified in Retention of Records Schedule 1 and Retention of Digital Records Schedule 2.

### Scope

FlexiSolar is bound by various obligations with regard to how the Documentation and electronic data is retained. These obligations include the period of retention for Documentation and when and how this Documentation is disposed.

Article 5 of GDPR provides “personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed”. The purpose of this Policy is to ensure that necessary records, documents and electronic data of FlexiSolar are adequately protected, archived and disposed of at the correct retention period, and to provide all staff with clear instructions regarding the appropriate retention and disposal of Documentation.

### Legal Obligation

- General Data Protection Regulation (GDPR)
- Data Protection Act 1998 (DPA)
- Freedom of Information Act 2000 (FOI)
- Limitation Act 1980
- Companies Act 2006
- The Waste Electric and Electronic Equipment Regulations 2013

### Retention Procedure

All decisions relating to the retention and disposal of Documents should be taken in accordance with this Policy, in particular;

Schedule 1 – Retention of Records Schedule – Provides the required retention periods, including the statutory minimum retention period for specific Documents.

Schedule 2 – Retention of Digital Records – Provides the required retention periods for all digital Documents.

In circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of the record.

## Retention of Encrypted Data

Any information retained under this Policy that is in an encrypted format, consideration must be taken for the secure storage of any encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

## Retention of Digital Data

All email files are retained in Outlook for 5 years. Client information is stored in HubSpot retained for 5 years.

The process for accessing stored electronic data is through a unique log-in, only possessed by FlexiSolar employees, and of which the password is changed every 90 days.

## Archiving and Retention of Documentation

Archiving is defined as the process by which inactive data, in any format is securely stored for long periods of time in accordance with a retention schedule.

FlexiSolar does not archive any records.

## Disposal of Records

Any record containing confidential information must either be disposed of in a confidential waste bin or shredder using a cross-cut shredder.

Disposal of documents that do not contain confidential information may be disposed of in the normal way or recycled.

Records of disposal should be maintained by each department and should detail as a minimum the document or information disposed of, the date of disposal and the disposal authority (see document 'FlexiSolar Record of Disposal').

## Disposal of Electrical Hardware

IT equipment and devices that have the ability and capability to store personal data include:

- PCs
- Laptops
- Mobile Phones
- Multi-Functional Devices E.g. Printer, Scanner
- Servers
- USB Memory Stick/External Hard Drive

IT equipment disposal must be managed by the Office Administrator.

All computer equipment, recycling or refurbishing must be disposed of in accordance with the Waste Electric and Electronic Equipment Regulations 2013.

## Document Owner

The Office Administrator is the owner of this Document and is responsible for ensuring that this Policy is reviewed in line with the review requirements of GDPR.



