



Data Protection Policy

Appendix

Data Retention

The table below outlines the Unions current data retention periods and associated actions.

Data Type	Retention period	Justification	Responsibility	Action Required
Student Data and Membership Records	Up to 5 years	Records used to maintain memberships to Union. Following course end date, records may remain in place for up to 5 years, for purchase audits, analytical data reviews and a digital Maintenance requirements.	Marketing and Communications	Ensure arrangement are in place with Data processor (MemPlus) to deletion periods are implemented
Guest Account Records and behaviour information	5 years following creation of account or 5 years from date of purchase transaction where they are made	To ensure data is deleted automatically in after the average lifespan in account usage. Transaction record need to auditing purposes	Marketing and Communications	Ensure arrangement are in place with Data processor (MemPlus) to deletion periods are implemented
Loyalty and EPOS data	Maximum of one year	Earning of loyalty point reset each financial year	Commercial	Annual clearing of loyalty point database at the end of each financial year
Market Research	Until research is analysed	Deleted once required insight is gained	Member of staff responsibly of research project	Any personal data removed as soon as it is no longer required to provide analysis
Form Submissions	Eighteen month	Data kept for reasonable	Marketing and Communications	Ensure 18-month deletion comment is

	following submission	operational and administrative needs		set up on Machform Server
Purchases and events attendance data	Up to six years	For financial auditing purposes	HR and Finance / Marketing and Communications	Ensure relevant data processors are contacted on an annual basis at the end of the financial year to remove any data over 5 years old.
Employment application data	Up to eighteen months after submission (unless applicant becomes employed)	Inline with HR requirements and applicant feedback processed	HR and Finance	Ensure 18 month deletion comment is set up on Machform Server and any hardcopy details are annually reviewed and destroyed
Human resources record	Indefinite	For legal compliance and employment processes.	HR and Finance	None
Financial records	Up to five years	For legal compliance with HMRC and financial auditing purposes	HR and Finance	Annual audit of financial information
Licensed venue ban records	Five years	To ensure legal compliance and ensure a safe environment if offered in out venues	Commercial	Annual audit of licensed venue ban records
Advice case records	Anonymised six years after a case closure	To ensure effective representation of students	Advice and Support	Ensure automated process is in place with data processor
Health and safety incident records	Five year following incident	To ensure adequate processing of information	CEO	Annual audit of records stored on Business Safe platform
Media Sales Records	Indefinite	For financial reporting and HMRC compliance	HR and Finance/ Marketing and Communications	None

Photos and quotes acquired for publication	Indefinite	To allow us to build awareness of the Union and the work it does	All	None
Emails	Indefinite	The Union reply on the universities email platform, therefore this is set in line with the universities retention policy	CEO	Ensure university email retention period is set in place.
Other data	Individually indicated	Any data collection, not covered In this table will provide clear notice to data subject of its retention period	All	Notice must be given and agree to at point of collection