

# Record Retention Policy

Our policy for retaining information

## 1 Scope

All Aseptika Ltd's records, whether analogue or digital, are subject to the retention requirements of this procedure.

## 2 Responsibilities

The Managing Director is accountable for the record retention and disposal arrangements. The Quality, Compliance and IG Manager is responsible for ensuring that retention and destruction is undertaken in accordance with this procedure.

## 3 Procedure

- 1) The required retention periods are recorded in Appendix A.
- 2) The access control policy determines the rights for accessing stored data.
- 3) Deletion of customer data from electronic data systems will be undertaken in accordance with the schedule and the Quality, Compliance and IG Manager is responsible for the confirming that the deletion run can take place. The Quality, Compliance and IG Manager is responsible for identifying any records (e.g. which may be subject to complaint) which must be excluded from the deletion run, or at request by the customer.
- 4) Electronic data will be logically deleted the media on which the data is held on will be subject to electronic shredding or physical destruction.
- 5) The responsibility for the destruction of paper information via shredding rests with the manager who holds the data.
- 6) Portable/removable storage media are physically destroyed.



## Appendix A Retention Schedule

Record type	Retention period required by law	Organisation retention period	Retention period to start from? (at creation, submission, payment, etc.)	Retention justification	Record medium	Disposal method
Customer data, including consent information		5 years	After the customer ceases to be a customer		Electronic (third party hosting provider).	Logical deletion.
Finance data	7 years	7 years	The end of a financial year after accounts have been closed		Electronic	Logical deletion
Policies/procedures/processes/privacy notices		5 years	After the policy is superseded.	Requirement to go back to demonstrate policies in place at the time.		Logical deletion
Third-party contracts/agreements		2 years	After the end of the contract			
Research records		In accordance with research protocol	In accordance with research protocol			Logical deletion and shredding



Record type	Retention period required by law	Organisation retention period	Retention period to start from? (at creation, submission, payment, etc.)	Retention justification	Record medium	Disposal method
Personnel records Including employee contracts, occupational health records and training records.		5 years	After termination of employment.		paper and electronic	Logical deletion and shredding
Reports of accountants		7 years			paper and electronic	Logical deletion and shredding
Employee payroll records		7 years			paper and electronic	Logical deletion and shredding
Employment applications		6 months	After the application has closed			Logical deletion
Subject access requests		5 years	After the subject access request has been completed.			Logical deletion
Software licenses		To end of life of the software				Logical deletion
System audit trails		2 years				Logs are set to automatically overwrite after 2 years



Record type	Retention period required by law	Organisation retention period	Retention period to start from? (at creation, submission, payment, etc.)	Retention justification	Record medium	Disposal method
Incident records		10 years	After the incident is closed. Incidents potentially subject to legal action (e.g. customer safety issues) will be retained for 10 years.			Logical deletion
Software design, development and testing documents.		Device life plus 3 years		ISO13485		Logical deletion

#### 4 Document History

Document History				
Version	Date released for approval	Contributors Initials	Reviewers Initials	Changes from Previous Version
v1.0	12.02.2018	GL		First Draft
v1.1	14.02.2018	KAA		Formatting
v1.3	15.02.2018	KAA		Policy Number added
V1.4	15.02.2018	JMA		Updated
V1.5	28.2.2018	KAA		Updated to make Public
V1.6	02.05.2018	ETRA		Update to a new template and change the policy number
V2.0	11/12/2018	ETRA	KAA, JAA, CB	Annual review and part of CC2018-0187