

1. Scope

All PharmaCare (Europe) Limited records, whether analogue or digital or paper, are subject to the retention requirements of this procedure. This policy and procedure applies to all of PharmaCare (Europe) Limited personal data processing functions, including those performed on customers', clients', employees', suppliers' and partners' personal data, and any other personal data the organisation processes from any source.

2. Purpose

The purpose of this Policy is to ensure that necessary records and documents of PharmaCare (Europe) Limited are adequately protected and maintained and to ensure that records that are no longer needed by PharmaCare (Europe) Limited or are of no value are securely disposed of at the proper time. This Policy is also for the purpose of aiding employees of The Company in understanding their obligations in retaining documents – including e-mail, paper documents, Web files, text files, sound and video files, PDF documents, and all Microsoft Office or other formatted files.

3. Policy

This Policy represents Pharmacare (Europe) Limited policy regarding the retention and disposal of physical (paper) records and the retention and disposal of electronic documents.

4. Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of PharmaCare (Europe) Limited and the retention and disposal of electronic documents. We will make modifications to the Record Retention Schedule from time to time and any retained information can only be used for the purpose for which it is stored. This is compliant with The **General Data Protection Regulation (GDPR)** (EU) 2016/679 regulation

A current version of this document is available to all members of staff on the *T Drive within the GDPR folder* and is published 18 July 2018.

5. Security of Personal Information

The Company will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

The Company will store all personal information on our secure (password-and firewall-protected) servers.

The Client should acknowledge that the transmission of information over the internet is inherently insecure, and that The Company cannot guarantee the security of data sent over the internet.

The Client will be responsible for keeping their Username and Password used for accessing The Company's website confidential; The Company will not ask for password other than when needed to log in to our website.

All computers, including laptops, storing personal or sensitive information is protected by hard drive disk encryption at a minimum with access controlled by at least username and password.

When data is on paper The Company will store information in a locked filing cabinet, drawer, or safe.

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6. Amendments

The Company may update this policy from time to time and will publish a new version. An update will be communicated by email to all staff and available on the T Drive within the GDPR Folder.

7. Applicability

This Policy applies to all physical records *and all electronic documents* generated during The Company's operation, including both original documents and reproductions.

APPENDIX A RECORD RETENTION SCHEDULE

The Record Retention Schedule is organised as follows:

SECTION TOPIC

1. Company records
2. Agreements & Contracts
3. Pension Records
4. Financial Records
5. Insurance Records
6. Accounting and Tax Records
7. Employee Records
8. Personal Information
9. Correspondence and Internal Memoranda
10. Electronic Records

1. Company records

Record Description	Retention Period
Certificate of Incorporation	Permanently
Certificate of commence business	Permanently
Certificate of company change of name	Permanently
Minutes of general meetings	Permanently
Report and accounts (signed copy)	Permanently

2. Agreements & Contracts

Record Description	Retention Period
All contracts with: customers, suppliers, agents	7 years after contract is terminated
Licensing agreements	10 years after expiry
Rental & hire-purchase	10 years after expiry
Indemnities and guarantees	10 years after expiry
Any other agreement or contract	10 years after expiry

3. Pension Records

Record Description	Retention Period
Pension scheme investment policies	12 years after settlement of claim or final cessation of benefit
Group Critical Illness scheme	12 years after cessation of benefit
Group Income Life assurance scheme	12 years after cessation of benefit
Group Life policy scheme	12 years after cessation of benefit

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4. Financial Records

Record Description	Retention Period
Cheques, bills of exchange and other negotiable instruments	7 years
Paying-in counterfoils	7 years
Bank statements and reconciliations	7 years
Foreign exchange rates	15 years
Instructions to banks	7 years after ceasing to be effective
Invoices	7 years
Business expense documents	7 years
Credit Card receipts	3 years
Petty Cash receipts/documents	3 years

5. Insurance Records

Record Description	Retention Period
Public liability policies	Permanently
Product liability	Permanently
Employers liability policies	Permanently
Insurance Schedules	7 years
Group personal accident policies	12 years after cessation of benefit
Personal claims	7 years from date of claim
Other policies	Until claims under policy are barred

6. Accounting & Tax Records

Record Description	Retention Period
Annual Audit Reports and Financial Statements	Permanently
Annual Audit Records; including work papers and documents that relate to the audit	7 years after completion of audit
Annual Plans and Budget	7 years
Taxation returns and records	10 years
VAT records	6 years
Income tax and NI returns, including correspondence with Tax Office	3 years after end of FY to which records relate
Income and expenditure	7 years

7. Employee Records

Record Description	Retention Period
Employee Personnel Records (including individual employment contracts, contact details, training records, disciplinary and grievance hearing notes)	7 years after employment ceases; could be longer with agreement of individual
Appointment and staff appraisal records	5 years
Redundancy records	12 years from date of redundancy
Payroll and wage records (including, bonuses and expenses)	6 years
Statutory sick pay records and calculations	3 years after end of FY to which records relate
Income tax records (eg: P45, P60)	6 years
Accident reports/books & correspondence	Duration of employment

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8.Retaining personal information

1. This Section sets out the data retention policies and procedure of The Company, which are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information.
2. Personal information that is processed by The Company for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. Personal information that is processed by the Company for dispatch will be kept for 12 months.

Without prejudice to point 2 (above) The Company will usually delete personal data falling within the categories set out below at the date/time set out below:

Brand – Bioglan

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	4 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	Indefinitely or until the client chooses to 'unsubscribe'
Reviews posted to our website for publication on the internet	Indefinitely unless user deletes comment
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	4 years following contact
Survey responses including name, age and health related responses	Indefinitely unless client requests removal of data

Brand – Bioglan Superfoods

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	3 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	Indefinitely or until the client chooses to 'unsubscribe'
Reviews posted to our website for publication on the internet	Indefinitely unless user deletes comment
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	3 years following contact

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Brand – Fat Blaster

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	3 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	2 years (products are being discontinued)
Reviews posted to our website for publication on the internet	2 years (products are being discontinued)
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	3 years following contact
Survey responses including name, before and after images	2 years (products are being discontinued)

Brand – Menoflavin

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Contact form submissions	5 years
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	5 years

Brand – Promensil

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	5 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	Indefinitely or until the client chooses to 'unsubscribe'
Reviews posted to our website for publication on the internet	Indefinitely unless user deletes comment
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	5 years following contact
Survey responses including name, occupation, age and health related responses	Indefinitely unless client requests removal of data

Brand – Real Health Manuka Honey

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for	6 years

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orders (including a name, postal address and email address)	
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	2 years (products are being discontinued)
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	6 years following contact

Brand – Sambucol

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	4 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	Indefinitely or until the client chooses to 'unsubscribe'
Reviews posted to our website for publication on the internet	Indefinitely unless user deletes comment
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	4 years following contact

Brand – Skin Doctors

Record Description	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	26 months
Information provided when completing a profile on our website for orders (including a name, postal address and email address)	4 years
Information provided for subscribing to email notifications and/or newsletters (including a name and email address):	Indefinitely or until the client chooses to 'unsubscribe'
Reviews posted to our website for publication on the internet	Indefinitely unless user deletes comment
Any other personal information (e.g. placing email/telephone/postal orders including individual and trade orders)	4 years following contact
Survey responses including name, age and lifestyle related responses including internal members of staff	Indefinitely unless client requests removal of data

Distribution

Record Description	Retention Period
Picking & Packing Notes (Direct to Consumer)	12 months
Picking & Packing Notes (Trade)	12 months

9. Correspondence and Internal Memoranda

Notwithstanding the other provisions of this Section, The Company will retain documents (including electronic documents) containing personal data:

- (a) to the extent that The Company is required to do so by law;
- (b) if The Company believes that the documents may be relevant to any ongoing or prospective legal proceedings;
- (c) and to establish, exercise or defend The Company's legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
- (d) if explicit consent is given by the data subject. Consent is requested at least every 2 years from candidates seeking contract roles and at least every 12 months for candidates seeking permanent employment

10. Electronic Documents

1. Electronic Mail: Not all email needs to be retained, depending on the subject matter.
 - All e-mail—from internal or external sources – is to be deleted after 12 months unless the information contained within is required under one of the reasons set out in section 9 above.
 - The Company will archive e-mail for 90 days after the staff has deleted it, after which time the e-mail will be permanently deleted.
 - Staff will take care not to send confidential/proprietary information held by The Company to outside sources
2. Electronic Documents: including Office 365 and PDF files, retention also depends on the subject matter.

The Company does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy.

In certain case's a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

Should you require any help regarding retention requirements please contact the HR & Privacy Officer at dp@pharmacareeurope.com.

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Document Owner and Approval

The HR & Policy Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the *T Drive within the GDPR Folder* and is published *July 2018*

This procedure was approved by the Head of Sales on 18 July 2018 and is issued on a version controlled basis under his signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue		18 July 2018