

Data Retention Policy

1. Purpose, Scope, and Users

This policy sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information within Stanford & Green Ltd. This Policy applies to all Company officers, directors, employees, agents, affiliates, contractors, consultants, advisors or service providers that may collect, process, or have access to data (including personal data and/or sensitive personal data). It is the responsibility of all of the above to familiarise themselves with this Policy and ensure adequate compliance with it.

This policy applies to all information used at Stanford & Green. Examples of documents include:

- Emails
- Hard copy documents
- Soft copy documents
- Video and audio
- Data generated by physical access control systems

2. Reference Documents

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
- Personal Data Protection Policy

3. Retention Rules

The destruction of records shall be in agreement with the client.

3.1. Retention General Principle

In the event, for any category of documents not specifically defined elsewhere in this Policy (and in particular within the Data Retention Schedule) and unless otherwise mandated differently by applicable law, the required retention period for such document will be deemed to be 3 years from the date of creation of the document.

3.2. Retention General Schedule

The Data Protection Officer defines the time period for which the documents and electronic records should be retained through the Data Retention Schedule.

3.3. Safeguarding of Data during Retention Period

The possibility that data media used for archiving will wear out shall be considered. If electronic storage media are chosen, any procedures and systems ensuring that the information can be accessed during the retention period (both with respect to the information carrier and the readability of formats) shall also be stored in order to safeguard the information against loss as a result of future technological changes. The responsibility for the storage falls to the Data Protection Officer.

3.4. Destruction of Data

Stanford & Green and its employees should therefore, on a regular basis, review all data, whether held electronically on their device or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant. See Appendix for the retention schedule. Overall responsibility for the destruction of data falls to the Data Protection Officer.

Once the decision is made to dispose according to the Retention Schedule, the data should be deleted, shredded or otherwise destroyed to a degree equivalent to their value to others and their level of confidentiality. The method of disposal varies and is dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly sensitive personal data) must be disposed of as confidential waste and be subject to secure electronic deletion; some expired or superseded contracts may only warrant in-house shredding. The Document Disposal Schedule section below defines the mode of disposal.

In this context, the employee shall perform the tasks and assume the responsibilities relevant for the information destruction in an appropriate way. The specific deletion or destruction process may be carried out either by an employee or by an internal or external service provider that the Data Protection Officer subcontracts for this purpose. Any applicable general provisions under relevant data protection laws and the Stanford & Green's Personal Data Protection Policy shall be complied with.

Appropriate controls shall be in place that prevents the permanent loss of essential information of the company as a result of malicious or unintentional destruction of information – these controls are described in the company's IT Security Policy.

The Data Protection Officer shall fully document and approve the destruction process. The applicable statutory requirements for the destruction of information, particularly requirements under applicable data protection laws, shall be fully observed.

3.5. Breach, Enforcement and Compliance

The person appointed with responsibility for Data Protection, the Data Protection Officer has the responsibility to ensure that each of the Stanford & Green's offices complies with this Policy. It is also the responsibility of the Data Protection Officer to assist any local office with enquiries from any local data protection or governmental authority.

Any suspicion of a breach of this Policy must be reported immediately to Data Protection Officer. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage to the Stanford & Green's reputation, personal injury, harm or loss. Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to Stanford & Green's premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

4. Document Disposal

4.1. Routine Disposal Schedule

Records which may be routinely destroyed unless subject to an on-going legal or regulatory inquiry are as follows:

- Announcements and notices of day-to-day meetings and other events including acceptances and apologies;
- Requests for ordinary information such as travel directions;
- Reservations for internal meetings without charges / external costs;
- Transmission documents such as letters, fax cover sheets, e-mail messages, routing slips, compliments slips and similar items that accompany documents but do not add any value;
- Message slips;
- Superseded address list, distribution lists etc.;
- Duplicate documents such as CC and FYI copies, unaltered drafts, snapshot printouts or extracts from databases and day files;
- Stock in-house publications which are obsolete or superseded; and
- Trade magazines, vendor catalogues, flyers and newsletters from vendors or other external organizations.

2. Destruction Method

Level I documents are those that contain information that is of the highest security and confidentiality and those that include any personal data. These documents shall be disposed of as confidential waste (cross-cut shredded and incinerated) and shall be subject to secure electronic deletion. Disposal of the documents should include proof of destruction.

Level II documents are proprietary documents that contain confidential information such as parties' names, signatures and addresses, or which could be used by third parties to commit fraud, but which do not contain any personal data. The documents should be cross-cut shredded and then placed into locked rubbish bins for collection by an approved disposal firm, and electronic documents will be subject to secure electronic deletion.

Level III documents are those that do not contain any confidential information or personal data and are published Company documents. These should be strip-shredded or disposed of through a recycling company and include, among other things, advertisements, catalogues, flyers, and newsletters. These may be disposed of without an audit trail.

5. Validity and document management

This document is valid as of 16 January 2024

The owner of this document is the Data Protection Officer Martin Stanford who must check and, if necessary, update the document at least once a year.

6. Appendices

Appendix: Data retention schedule

Type	Item	Description	Disposal
Cheques	1	Cheque book/butts for all accounts	Two years
	2	Cancelled cheques	Two years
	3	Dishonoured cheques	Two years
	4	Fresh cheques	Six years
	5	Paid/presented cheques	Six years
	6	Stoppage of cheque payment notices	Two years
	7	Record of cheques opened books	Two years
	8	Cheque registers	Two years
	9	Record of cheques drawn for payment	Six years
Bank deposits	10	Bank deposit books/slips/butts	Two years

	11	Bank deposit summary sheets Summaries of daily banking Cheques schedules	Two years
	12	Register of cheques lodged for collection	Two years
Bank reconciliations	13	Reconciliation files/sheets	Two years
	14	Daily list of paid cheques	Two years
	15	Unpaid cheque records	Two years
Bank statements	16	Bank statements, periodic reconciliations	Two years
	17	Bank certificates of balance	Two years
Electronic banking and electronic funds transfer	18	Cash transactions Payment instructions	Disposal action in line with paper records

Type	Item	Description	Disposal
Electronic banking and electronic funds transfer (continued)	19	Audit trails	Retain for the same period as the base transaction record

Expenditure records

Type	Item	Description	Disposal
Cash books/sheets	1	Expenditure sheets	Six years
	2	Cash books/sheets	Six years
Petty cash records	3	Petty cash records/books/sheets	Two years
	4	Petty cash receipts	Two years
	5	Postal cash book/sheets Postage/courier account/cash records Register of postage expenditure Postage paid record Postage books sheets	Two years
	6	Summary cash books	Two years
Creditors	7	Creditors' history r Lists/reports	Six years
Statements	8	Statements of accounts outstanding Outstanding orders	Two years
	9	Statements of accounts –rendered/ payable	Two years
Subsidiary records	10	Copies of extracts and expenditure dissections	One year
	11	Credit note books	Two years
	12	Credit notes	Two years
	13	Debit note books	Two years



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Type	Item	Description	Disposal
Vouchers	14	Vouchers –claims for payment, purchase orders, requisition for goods and services, accounts payable, invoices and so on	Six years
	15	Wages/salaries vouchers	Six years
	16	Copies of vouchers	One year
	17	Voucher registers	Two years
	18	Voucher registration cards and payment cards	Six years
	19	Voucher summaries	One year
	20	Advice/schedule of vouchers despatched Delivery advice	One year
Costing records	21	Cost cards	Two years
	22	Costing records, dissection sheets and so on	Two years

Ledger records

Type	Item	Description	Disposal
General and subsidiary ledgers	1	General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information	Six years
	2	Cash books/sheets	Six years
	3	Other ledgers (such as contracts, costs, purchases)	Two years
Related journals	4	Audit sheets –ledger posting	Two years
Journals	5	Journals –prime records for the raising of charges	Six years

	6	Journals –routine adjustments	Two years
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Type	Item	Description	Disposal
Trial balances and reconciliations	7	Year-end balances, reconciliations and variations to support ledger balances and published accounts	Six years

Receipts and revenue records

Type	Item	Description	Disposal
Books/butts	1	Receipt books/butts Office copies of receipts –cashiers register, fines and costs, sale of publications, general receipt books/butts/records	Six years
	2	Postal remittance books/records	Six years
	3	Receipt books/records for imposts (such as stamp duty, VAT receipt books)	Six years
	4	Irregular remittance books	Two years
Cash registers	5	Copies of forms	Six years
	6	Reconciliation sheets	Six years
	7	Audit rolls	Two years
	8	Summaries/analysis records	Two years
	9	Reading books/sheets	Two years
Cashiers'	10	Handover books	Two years
Revenue records	11	Revenue cash books/sheets/records Receipt cash books/sheets	Six years
	12	Daily revenue dissections	One year

Debtors' and invoices	13	Periodical revenue dissections	One year
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Type	Item	Description	Disposal
Debtors' and invoices (continued)	14	Copies of invoices/debit notes rendered on debtors (such as invoices paid/unpaid, registers of invoices, debtors ledgers)	Six years
	15	Source documents/records used for raising of invoices/debit notes	Six years
Debits and refunds	16	Copies of invoices and copies of source documents	Two years
	17	Records relating to unrecoverable revenue, debts and overpayments (such as register of debts written off, register of refunds)	Six years

Salaries and related records

Type	Item	Description	Disposal
Salary records	1	Employee pay histories Note that the last three years' records must be kept for leavers, in either the personnel or finance records system, for the calculation of pension entitlement	Six years
	2	Salary rates register	When superseded
	3	Salary ledger card/records	Six years
	4	Copies of salaries/wages payroll sheets	Two years

Stores records

Type	Item	Description	Disposal
Stores records	1	Goods inwards books/records	Six years
	2	Delivery dockets	Two years



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	3	Stock/stores control cards/sheets/records	Two years
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Other accountable financial records

Type	Item	Description	Disposal
Asset registers	1	Assets/equipment registers/records	Six years after asset or last one in the register is disposed of
Depreciation registers	2	Records relating to the calculation of annual depreciation	Six years after asset or last one in the register is disposed of
Financial statements	3	Statements/summaries prepared for inclusion in quarterly/annual reports	Six years
	4	Periodic financial statements prepared for management on a regular basis	Destroy when cumulated into quarterly/annual reports
	5	Ad hoc statements	One year

Martin Stanford (Director)

A handwritten signature in black ink, appearing to read 'Martin Stanford'.

Stanford & Green

8 January 2026