

# Data Retention and Storage Policy

## 1. Scope and principles

All Shift Learning's records and data, whether digital or analogue, are subject to the retention requirements of this procedure.

In this policy document we aim to operate in a way that is legal, in accordance with the Data Protection Act, the GDPR, the guidelines of the MRS and ESOMAR and the quality standard for market research ISO 20252. Where there are conflicts between these policies we have used our judgement, prioritising what is legal and ethical.

In alignment with the GDPR, it has the ambition that data is not held for longer than is necessary but that the storage of data for longer periods than necessary is allowable where the data is being processed for archiving purposes in the public interest and/or scientific purposes.

## 2. Responsibilities

2.1 The following roles are responsible for retention of these records because they are the information asset holders.

2.2 The Operations Director & Data Protection Officer is responsible for the retention of financial, HR, Health & Safety, statutory and regulatory records and data in line with these procedures.

## 3. Procedures

3.1 The required retention periods by record type are recorded below.

## 4. Exceptions

4.1 Exceptions should be made to general deletion principles if there is litigation occurring or pending.

4.2 Exception can be put into place if individuals are exercising their right to be forgotten.

## 5. Policy review

5.1 This policy is to be reviewed by the company directors at least annually.

Record type	Retention Period	Retention Period to start from	Retention justification	Medium and storage location	Disposal Method	Person with responsibility to dispose
Accounts info	5 years	End of that financial year accounting period	Legal reasons, in case of investigation	Paper and electronic	Shredding & Deletion	Operations Director
Staff personal details	5 years	End of that financial year accounting period	Legal reasons, in case of investigation	Paper and electronic	Shredding & Deletion	Operations Director
Client and potential client data	Retained unless unsubscribed or bounced back. Request annual update.	n/a	Use for mailings	Electronic – within Highrise	Deletion	Managing Director
Respondent opt-in surveys	Must be entered into Mail chimp within 30 days then deleted	Survey close	Need it until this point	In QuestionPro	Deletion	Field manager
Respondent contact data from opt ins esurvey	Retained unless unsubscribed or bounced back. Request annual update.	n/a	Opt-in data with full permission required for future projects.	Electronic – within Mailchimp	Deleted	Field manager
3 <sup>rd</sup> party lists sent by clients	Deleted from FTP when downloaded onto S drive; S drive version paid within one week payment of the final client invoice	n/a	Should be retained in case additional services are required up until this point. All files of this type to be password protected with passwords held in the Operations Directors private drive.	Electronic file	Deletion	Operations Director to delete FTP; Project Director to delete from the shared drive
3 <sup>rd</sup> party lists obtained from suppliers	Single use - deleted on payment of the final client invoice Multiple use – kept on Jack's private drive and deleted only when uses are used up	n/a	Should be retained in case additional services are required up until this point. All files of this type to be password protected with passwords held in the Operations Directors private drive.	Electronic file	Deletion	Operations Director to delete FTP; Project Director to delete from the shared drive
Other data from clients e.g. data on enrolments, market share data	Deleted on payment of the final client invoice	n/a	Should be retained in case additional services are required up until this point	Electronic file	Deletion	Project Director
Focus group opt-in sheets	Must be entered into Mail chimp within 30 days then destroyed	Date of focus group	Need it until this point	Paper	Shredded	Qualitative Analyst
Interview and focus group recordings (video & audio)	Deleted on payment of the final client invoice	n/a	Should be retained in case additional services are required up until this point	Video & audio files	Deletion	Project Director
Interview and focus group transcripts (with identifying information)	Deleted when anonymised	n/a	Should be retained in case additional services are required up until this point	Electronic	Deletion	Research Assistant involved in anonymising
Interview and focus group transcripts (pseudonymised)	1 year	Final client invoice	In case of client audit	Word files	Deletion	Operations manager
Interview & focus group schedule with participant names	Deleted on payment of the final client invoice	Final client invoice	In case of client audit	Word files	Deletion	Field manager
Paper interview scripts with notes on	Deleted on return of transcriptions/ within 2 months	Deleted on return of transcriptions/ within 2 months	Held as back up in case the audio recording has been corrupted pre transcription	Held in server room/or with interviewer in the Shift Learning office	Secure shredding	Individual interviewer/ Qual Analyst/Ops Dir.
Project print outs, presentations, etc.	Deleted on payment of the final client invoice	Final client invoice	In case of client audit	Word files	Deletion	Project Director

Record type	Retention Period	Retention Period to start from	Retention justification	Medium and storage location	Disposal Method	Person with responsibility to dispose
Paper surveys	Deleted on payment of the final client invoice	Final client invoice	In case of client audit	Word files	Deletion	Field manager
Interview and focus group participants incentive information	All banking and account information, address and contact detail - delete when all successfully paid: Names & amounts and method of payment, agreements and date and project to be kept password protected on the Operational Director's private drive.	Final payments of respondents	In case of problems with payment	Spreadsheets	Deletion	Qualitative Analyst to clean up the sheet and put on the S drive; Operations Director responsibility to delete
eSurvey results (with identifying information)	To be deleted, once prize draw winners have been drawn and accepted their prize and the opt-ins have been transferred to MailChimp.	n/a	No requirement for it after this point	Electronic file	Deletion	Lead Research Assistant
eSurvey results (anonymised)	To be retained for 8 years	n/a	Contain no personal data, therefore not a concern. Retained in case of requirement for longitudinal work.	Q file + survey with no data (do in Q pack)	n/a	n/a
eSurvey prize winners bank details	To be deleted, once prize draw winners have been drawn and accepted their prize	n/a	No requirement for them after this time	Electronic file	Deletion	Operations Director
Work emails	Emails to be archived after 7 years UNLESS they contain other sorts of data covered in this policy e.g. 3 <sup>rd</sup> party data, financial	n/a	May be needed in the case of litigation or dispute.	Electronic file	Deletion	Individual staff members
Research tools, proposals, reports	Final versions to be kept in the file. Whole project files to be deleted after 8 years.	Final project invoice	Contain no personal data, therefore not a concern – may be useful for future projects	Electronic file	Deletion	Project Director to delete all but final versions