



CES Data Retention Statement February 2018

1. Scope

This Statement applies to all of Capita Employee Solutions (CES) operational business and client data for the purpose of performing contractual duties and complying with legal obligations. This includes personal data within the scope of the Data Protection Act 1998, from the 25th May 2018, the General Data Protection Regulations (EU2016/679) (where it is normally the case that CES is Data Processor and the Client is Data Controller). Where CES is the Data Processor the data will be dealt with in line with this statement and the Data Controller's instructions.

Data transferred to selected third parties for the purpose of completing necessary business will be covered under the Capita Data Transfers Procedure and associated information security procedures.

CES Staff data is not included within the scope of this Statement.

2. Policy Statement

Due to the long-term nature of conducting pensions and HR related business, CES will retain current and historic data for 7 years from the exit point of the contractual relationship with 'the Client', unless specifically agreed otherwise in writing with the Client on a client-by-client basis, subject always to compliance with minimum legal requirements for data retention. Following this period the data will be destroyed.

'The Client' includes authorised representative(s) of registered companies, trustee bodies or government agencies whereby an agreement to perform paid duties exists by custom and practice, letter of agreement or contract. However, for prospective and previous clients, data will also be retained as stated above.

'Data' includes paper records and information/records on computer systems (including encrypted back-ups, and web hostings) the exceptions to this would be the following data items:

- Call recording - 7 years standard
- Emails - 3 years standard; 15 years for Risk & Compliance and Audit classified staff

Capita may on occasion anonymise personal data hosted on our systems in line with the ICO guidance and use the resulting non-personal data for the onward development of our software systems or for input into industry statistics.

Appendix A stipulates the Financial Conduct Authority's (FCA's) minimum data retention requirements for a FCA regulated firm, along with guidance from relevant professional bodies. All rule requirements will be complied with under the terms of this Statement.

3. Statement Review

The CES Risk & Compliance Committee will review the strategy, content and operational implementation of this Statement at two-yearly intervals from introduction in December 2017, unless a significant change in legislation and / or regulation necessitates an immediate review.