

EMPLOYMENT RECORDS: RETENTION AND ERASURE GUIDELINES

1. About these guidelines

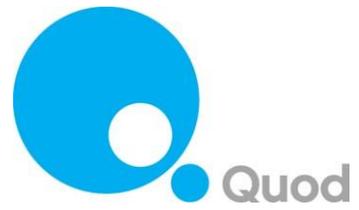
- 1.1 These guidelines support Quod Limited ("**Quod**")'s Privacy Standard and various Privacy Notices. Definitions are consistent throughout.
- 1.2 The guidelines are intended to ensure that we process personal data in the form of employment records (by which we are referring to all records in respect of anyone who works for/provides their service or services to us in any capacity whatsoever, not just as an employee) in accordance with the personal data protection principles, in particular that personal data must:
- (a) Be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
 - (b) Be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When personal data is no longer needed for specified purposes, it is deleted or anonymised as provided by these guidelines.
 - (c) Be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.
 - (d) Not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.
 - (e) Be secured by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 1.3 The Data Protection Officer is responsible for overseeing these guidelines. Any questions about the operation of the guidelines should be submitted to the Data Protection Officer or a member of the HR team.

2. Location of employment records

- 2.1 Our HR department holds employment records and can be contacted with any enquiries relating to your personal data. Data may be held in both electronic and physical forms.

3. Keeping information up to date

- 3.1 We need to ensure that your personal details are up to date and accurate.



3.2 When you first start working for us, we record various information including (but not limited to) your name, address, emergency contact, banking details etc. In the event that any information should change, you must update your details fully with us. You may be invited to review and update personal information on a regular basis.

3.3 These provisions are intended to complement the data subject rights referred to in our Privacy Standard.

4. General principles on retention and erasure

4.1 Our approach to retaining employment records is to ensure that it complies with the data protection principles referred to in these guidelines and, in particular, to ensure that:

- (a) Employment records are regularly reviewed to ensure that they remain adequate, relevant and limited to what is necessary to facilitate you working for us.
- (b) Employment records are kept secure and are protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- (c) Where appropriate, we use pseudonymisation or anonymisation to prevent identification of individuals.
- (d) When records are destroyed, whether held as paper records or in electronic format, we will ensure that they are safely and permanently erased.

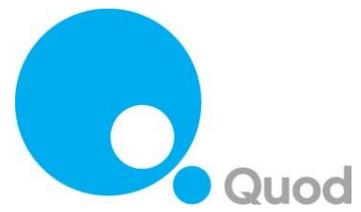
5. Retention and erasure of recruitment documents

5.1 We retain personal information following recruitment exercises to demonstrate, if required, that candidates have not been discriminated against on prohibited grounds and that recruitment exercises are conducted in a fair and transparent way.

5.2 Our GDPR Candidate Privacy Notice advises candidates how long we expect to keep their personal information for, once a recruitment decision has been communicated to them.

5.3 Information relating to successful candidates will be transferred to their employment record with us. This will be limited to information that is:

- (a) Transferred to the employment record with your consent.
- (b) Necessary for the working relationship.
- (c) Necessary for the performance of your contract.
- (d) Necessary for us to fulfil a legal obligation.



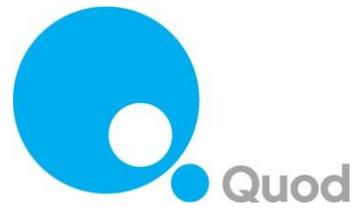
- (e) Required by law.
- (f) Held for the legitimate interests of us or a third party, namely to protect against legal proceedings.

5.4 Following a recruitment exercise, information, in both paper and electronic form, will be held by the HR department. Destruction of that information will take place in accordance with these guidelines.

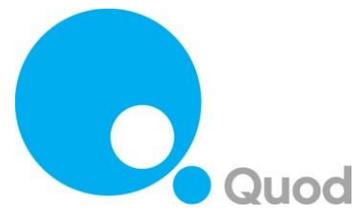
6. Retention and erasure of employment records

6.1 We have regard to the recommended retention periods for particular employment records set out in legislation, as referred to in the table below. However, we also have regard to legal risk and will therefore typically keep records (except where otherwise stated above) for up to seven years (and sometimes longer) after your period of working for/with us has ended. This represents a legitimate interest of us and/or a third party.

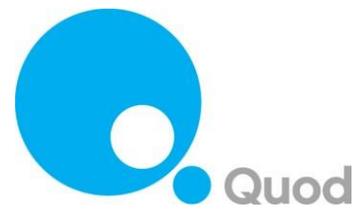
Type of employment record	Retention period
<p>(a) <u>Recruitment records</u></p> <p>These may include:</p> <ul style="list-style-type: none"> (i) Completed online application forms, CVs & covering letters. (ii) Equal opportunities monitoring forms. (iii) Assessment exercises or tests. (iv) Notes from interviews & short-listing exercises. (v) Pre-employment verification of details provided by the successful candidate (e.g. checking qualifications and taking up references), which may be transferred to a successful candidate’s personnel file. (vi) Criminal records checks, which may be transferred to a successful candidate’s personnel file if they are relevant to the ongoing relationship. 	<p>Six months after notifying candidates of an unsuccessful outcome of the recruitment exercise and typically seven years after the end of any resultant working relationship.</p>
<p>(b) <u>Immigration checks</u></p>	<p>During the working relationship and a minimum of three years after the termination of it, but typically seven years after the termination of the working relationship.</p>



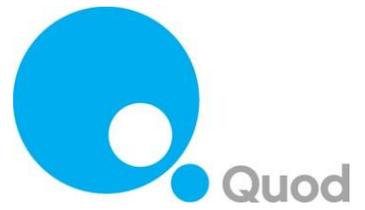
Type of employment record	Retention period
<p>(c) <u>Contracts</u></p> <p>These may include:</p> <ul style="list-style-type: none"> (i) Written particulars of employment. (ii) Contracts of employment or other contracts. (iii) Documented changes to terms and conditions. 	<p>While the working continues and typically for seven years after it has ended.</p>
<p>(d) <u>Collective agreements</u></p> <p>Collective workforce agreements and past agreements that could affect present employees.</p>	<p>During the working relationship and typically for seven years after the working relationship ends.</p>
<p>(e) <u>Payroll and wage records</u></p> <ul style="list-style-type: none"> (i) Payroll and wage records. (ii) Details on overtime. (iii) Bonuses. (iv) Expenses. (v) Benefits in kind. 	<p>These must be kept during the working relationship and for a minimum of three years after the end of the tax year to which they relate. However, they will typically be retained for seven years after the working relationship ends.</p>
<p>(f) <u>Current bank details</u></p>	<p>Bank details will be deleted as soon after the end of the working relationship as possible, once final payments have been confirmed as made.</p>



Type of employment record	Retention period
(g) <u>PAYE records</u>	These must be kept during the working relationship and for at least three years after the end of the tax year to which they relate. However, they will typically be retained for seven years after the working relationship ends.
(h) <u>Payroll and wage records for companies</u>	These must be kept during the working relationship and for six years from the financial year-end in which payments were made. However, they will typically be retained for seven years after the working relationship ends.
(i) <u>Payroll and wage records for unincorporated businesses</u>	These must be kept during the working relationship and for five years after 31 January following the year of assessment. However, they will typically be retained for seven years after the working relationship ends.
(j) <u>Records in relation to hours worked and payments made to workers</u>	These must be kept during the working relationship and for three years beginning with the day on which the pay reference period immediately following that to which they relate ends. However, they will typically be retained for seven years after the working relationship ends.
(k) <u>Travel and subsistence.</u>	While the working relationship continues and typically for seven years after the working relationship ends.



Type of employment record	Retention period
<p>(l) <u>Record of advances for season tickets and loans to employees</u></p>	<p>While the working relationship continues and typically for seven years after the working relationship ends.</p>
<p>(m) <u>Personnel records</u></p> <p>These include:</p> <ul style="list-style-type: none"> (i) Qualifications/references. (ii) Consents for the processing of special categories of personal data. (iii) Annual leave records. (iv) Annual assessment reports. (v) Disciplinary procedures. (vi) Grievance procedures. (vii) Death benefit nomination and revocation forms. (viii) Resignation, termination and retirement. 	<p>While the working relationship continues and typically for seven years after the working relationship ends.</p>
<p>(n) <u>Records in connection with working time</u></p> <p>These include:</p> <ul style="list-style-type: none"> (i) Working time opt-out forms. (ii) Records to show compliance, including: <ul style="list-style-type: none"> (a) Time sheets for opted-out workers. (b) Health assessment records for night workers. 	<p>These must be kept for a minimum of three years from the date on which they were entered into and three years after the relevant period. However, they will typically be retained for seven years after the working relationship ends.</p>



Type of employment record	Retention period
<p>(o) <u>Maternity records</u></p> <p>These include:</p> <ul style="list-style-type: none"> (i) Maternity payments. (ii) Dates of maternity leave. (iii) Period without maternity payment. (iv) Maternity certificates showing the expected week of confinement. 	<p>These must be kept for a minimum of four years after the end of the tax year in which the maternity pay period ends. However, they will typically be retained for seven years after the working relationship ends.</p>
<p>(p) <u>Accident records</u></p> <p>These are created regarding any reportable accident, death or injury in connection with work.</p>	<p>These must be kept for a minimum of four years from the date the report was made. However, they will typically be retained for seven years after the working relationship ends.</p>