# Beaverstown Golf Club (BGC) Data Retention and Destruction Policy

## Introduction .

The Data Protection Acts 1988 and 2003 impose obligations on BGC, as a Data Controller, to process personal data in a fair manner which notifies data subjects of the purposes of data processing and to retain the data for no longer than is necessary to achieve those purposes.

Individuals have a right to be informed about how their personal data is processed and on the retention periods or criteria used to determine the retention periods.

If there is no justification for retaining personal information, then that information should be routinely deleted

## Scope .

This policy covers data that is held by the Club in relation to members, staff, suppliers and customers in both manual and electronic format.

## Rationale .

The need to retain data varies widely with the type of data. The purpose of this policy is to specify the Club’s guidelines for retaining different types of data.

## Retention guidelines .

This section sets down the guidelines for retaining different types of Club data:

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| **Data** | **Retention Period** |
| Supplier data | As long as the customer is active + 5 years |
| Employee data | For the duration of employment +5 years |
| Contracted person | For the duration of the contract + 5 years |
| Tax payments | 5 years |
| Records of annual leave | 3 years |
| Recruitment details i.e. CV etc | For unsuccessful candidates 1 year after interview |
| Health and Safety  | 7 years for major accidents or dangerous occurrences |
| Planning data | indefinitely |
| Operational data | 5 years |
| Confidential data | 7 years |
| Garda vetting checks | 5 years |
| Written allegations or complaints | indefinitely |
| Superannuation pension or retirement records | indefinitely |
| Occupational injuries | Employment period + 5 years |
| Meeting minutes and committee meeting minutes | indefinitely |
| Construction and real estate documents documents | indefinitely |
| Tax records | indefinitely |
| Emails business | indefinitely |
| Sales and purchase records | 5 years |
| AGM records and statements | indefinitely |
| Leases | 6 years after expiry |

## Data Destruction Guidelines .

Data destruction is a critical part of the data retention policy. When the retention timeframe expires the Club will actively destroy the data, and all its copies, covered in this policy. Manual files will be destroyed by shredding.

In the event that a staff member feels that data identified under this policy should not be destroyed then that concern should be escalated to the Club secretary for a management decision.

Destroying data that a user feels may be harmful to him or herself is expressly forbidden under this policy as is destroying data in an attempt to cover up any violation of the law or of company policy.