

Schedule 11 **Retention and deletion policy**

1. Client Matter Files

- 1.1 Our Terms of Business are sent to a client on each occasion a new matter is opened. Clause 9 'Files and Documents' states that:
 - 1.1.1 we may destroy physical copies of documents once we have made electronic copies for our file. Clients are required to make specific arrangements with us if they wish papers to be retained in physical copies.
 - 1.1.2 we will retain files and papers, including in electronic form, for such a period as we consider being reasonable, which will be a minimum of six years but we have the right to destroy them without reference to the client after such period. Clients are required to make specific arrangements with us if they wish papers to be retained.
- 1.2 All closed client matters will have a retention period of not less than 12 years running from the date of file closure. At the 12 year point the file will be destroyed unless there is a compelling reason for the firm to retain the file and this complies with GDPR.
- 1.3 Electronic copies of completed transaction documents stored as a transaction "bible" will be retained for 20 years from the date of file closure.
- 1.4 Accounts records held on our files are handled as set out in 1.2. Hard copies held by the accounts team will be deleted after seven years.

2. KYC information

- 2.1 KYC information supplied to us by or in respect of our clients will be routinely assessed for disposal seven years from the date that the relationship with the client ends. This is deemed to be from the moment that the last file for that client is closed. At that point, the information will usually be destroyed, unless our assessment indicates good reason for its retention.
- 2.2 KYC information provided to us in other circumstances (e.g. to allow us to accept payments from non-clients) will be held as part of the client file and handled as set out in 1.2 above.

3. Deeds Wills and Trust Documents

- 3.1 Where we are instructed to store deeds (including other original documents relating to the property concerned) by a client, then subject to any terms applicable to such storage, the deeds will have an unlimited retention period.
- 3.2 The same provisions apply to original wills we hold for clients.

4. HR information

- 4.1 HR records will be destroyed after 12 years. For the purposes of administration this will be actioned annually in December of each year.
- 4.2 Webserver Job alerts will be removed 15 months after being added and job applications will be removed three months after the vacancy has been filled.
- 4.3 Personal data obtained from job applicants will be deleted after 2 years.

4.4 Personal data stored in private workspaces created for partners and managers for HR information (including for appraisals, promotion and probation reviews) will be deleted 15 months after creation.

5. Marketing

Contact information relating to clients and contacts will be held for so long as we believe the information to remain accurate and the individual concerned remains a genuine connection of the firm, or of one of our partners and staff. We have a programme for reviewing our contacts regularly, and removing any information which is considered to be out of date or no longer relevant.

6. Other information

- 6.1 Routine business records, such as postage receipts, document delivery tracking, health and safety information are destroyed after 12 months.
- 6.2 Accounts and file opening records are destroyed after seven years.
- 6.3 Facilities records are destroyed after 12 years.
- 6.4 CCTV information is destroyed after 60 days .