

## Records Management Policy

### 1. Purpose and Scope of Policy

Records management is vital to the delivery of our services in an orderly, efficient, and accountable manner. Effective records management will help ensure that we have the right information at the right time to make the right decisions. Records, and the information they preserve, are an important company asset.

By adopting this policy we aim to ensure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- help us carry out our business;
- help us to make informed decisions;
- protect the rights of clients, employees, regulated entities, and the public;
- track policy changes and development;
- make sure we comply with relevant legislation;
- provide an audit trail to meet business, regulatory and legal requirements;
- support continuity and consistency in management and administration;
- make sure we are open, transparent and responsive;
- support research and development;
- promote our achievements.

This policy applies to the management of all documents and records, in all technical or physical formats or media, created or received by UniQuest Limited in the conduct of its business activities. It applies to all staff, contractors, consultants and third parties who are given access to our documents and records and information processing facilities.

UniQuest maintains records in line with our Data Protection Policy and those of the Information Commissioner's Office (our registration number is ZA024234). We have given consideration to legislation, contractual requirements, the statute of limitation for bringing or making a claim, re-engaging the individual in other opportunities and the research that indicates that clients review their service requirements every 3 years when determining the retention period for each of the data types.

Where UniQuest processes data on behalf of our customers, UniQuest abides by the terms included in the contract between UniQuest and the customer. The customer is the data controller and therefore UniQuest will perform its duties upon the instruction of the customer.

### 2. Data Retention Schedule

Data Type	Reason for Retention	Retention Period
<b>CLIENT DATA</b>		
Prospective Clients:		3 years since last contact unless individual has requested to be

<ul style="list-style-type: none"> <li>- Contact details, job title, and correspondence</li> </ul>	<p>For the purposes of assessing whether a potential client is interested in our services.</p>	<p>deleted in which case record is deleted within 30 days of deletion request.</p>
<p>Clients:</p> <ul style="list-style-type: none"> <li>- Contact details, job title, and correspondence</li> <li>- Payment details</li> </ul>	<p>To contact the client during the service periods and to keep contact with potential clients after the contract has ended and to understand their preferences.</p> <p>To keep a record of payments made and received. 6 years reflects the legal period for contractual claims.</p>	<p>5 years since last contact unless individual has requested to be deleted in which case record is deleted within 30 days of deletion request.</p> <p>6 years.</p>
<b>SUPPLIERS/PARTNERS</b>		
<p>Suppliers/Partners:</p> <ul style="list-style-type: none"> <li>- Contact details</li> <li>- Correspondence</li> <li>- Payment details</li> </ul>	<p>To contact our suppliers and partners for the provision of services either to UniQuest or our customers during their service periods.</p> <p>To keep a record of information, appointments, pricing and contracts, and correspondence.</p> <p>To keep a record of payments made and received. 6 years reflects the legal period for contractual claims.</p>	<p>3 years since last contact unless individual has requested to be deleted in which case record is deleted within 30 days of deletion request.</p> <p>As above.</p> <p>6 years.</p>
<b>EMPLOYEES</b>		
<p>Staff and Contract Staff:</p> <ul style="list-style-type: none"> <li>- Contact details, job title, and period of employment</li> </ul>	<p>To maintain contact with current employees and for providing references for former employees</p>	<p>6 years from end of employment</p>

<ul style="list-style-type: none"> <li>- Work and salary history, performance, disciplinary and grievance records, sickness records, correspondence, contracts and undertakings</li> <li>- Passports &amp; visas</li> <li>- Payment details, Bank details, NI Number, Tax information</li> <li>- Emergency contact details</li> </ul>	<p>To defend ourselves or bring legal claims. Information relating to potential complaints or that could be needed to defend claims including appraisal information and information relating to dismissals or performance issues or complaints from clients or other staff.</p> <p>To prove a valid right to work excuse and confirm identity.</p> <p>To keep a record of payments made and received. 6 years reflects the legal period for contractual claims.</p> <p>To contact next of kin in case of emergencies</p>	<p>6 years from end of employment</p> <p>6 years from end of employment</p> <p>6 years from end of employment</p> <p>1 year from end of employment</p>
<p>Prospective Employees/Job Applicants:</p> <ul style="list-style-type: none"> <li>- Contact details and publicly available career information.</li> <li>- References.</li> <li>- CV information, contracts and other information provided by the Candidate.</li> </ul>	<p>For the purposes of assessing their suitability for particular roles and contacting them about this.</p> <p>As above.</p> <p>As above.</p>	<p>1 year unless the individual says that they do not want to be contacted or has requested to be deleted in which case this information is deleted within 30 days of the deletion request.</p> <p>As above.</p> <p>As above.</p>

- Correspondence.	To keep a record of information, appointments and correspondence.	As above.
Call recordings: - Contact centre and general calls via the Natterbox phone system	For staff training and quality control.	6 months

### 3. Data Destruction

Data destruction is a critical component of our data retention policy. We ensure that we will keep data only as long as necessary and for the original basis for which it was intended. When personal data is no longer required, and in accordance with our data retention schedule or a data subject's request for deletion, we will securely delete and destroy said record(s) and data.

### 4. Suspension of record disposal in the event of legal proceedings or claims

There are certain occasions when information needs to be preserved beyond any limits set out in this policy. The policy must be suspended relating to a specific customer or document and the information retained beyond the period specified in the above schedule in the following circumstances:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened or actual.
- A crime is suspected or detected.
- Information is relevant to a company in liquidation or receivership, where a debt is due to UniQuest.

This policy is subject to review and the Company reserves the right to amend this policy without prior notice.

#### Document Information

<b>Version</b>	1.0
<b>Issue date</b>	April 2021
<b>Review date</b>	April 2022
<b>Written by</b>	QWOBO Consulting
<b>Authorised by</b>	Sharon Johnson, Finance & People Operations Director