



MDS UK Patient Support Group

Data Retention Policy

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MDS UK Patient Support Group: Data Retention Policy

1 Overview

The MDS UK Patient Support Group seeks to ensure that it retains only data necessary to effectively conduct its charitable objectives and work in fulfilment of its mission.

The need to retain data varies widely with the type of data and the purpose for which it was collected. The MDS UK Patient Support Group strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required. This policy sets forth MDS UK Patient Support Group's guidelines on data retention and is to be consistently applied throughout the organization.

2 Scope

This policy covers all personal data collected by MDS UK Patient Support Group and stored on MDS UK Patient Support Group owned or leased systems and media, regardless of location.

It applies to both data collected and held electronically (including photographs, video and audio recordings) and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by law, regulations and legitimate business purposes, as well as the EU General Data Protection Regulation (GDPR).

3 Document Ownership and Maintenance

The COO of MDS UK Patient Support Group is designated as the owner of this document.

The policy is reviewed and approved by the CEO and the Trustees and forms one of MDS UK Patient Support Groups key policies.

Updating of this document will occur whenever there is a change in approach to the group's data retention approach or where there is a change in legislation or regulation that requires a revision.

4 Adherence

Adherence to this policy is the responsibility of all staff, including salaried staff, contractors, volunteers and trustees.

Non-adherence to the policy must be reported to the policy owner for review and resolution.



5 Reasons for Data Retention

The MDS UK Patient Support Group retains only that data that is necessary to effectively conduct its activities, fulfill its charitable mission and comply with applicable laws and regulations.

Reasons for data retention include:

- Providing an ongoing service to the data subject (e.g., sending a newsletter, publication or ongoing charity updates to an individual, participation in the group's meetings and events, ongoing training or participation in the MDS UK Patient Support Group's programs, processing of employee payroll and other benefits)
- Compliance with applicable laws and regulations associated with financial and programmatic reporting by MDS UK Patient Support Group to its funding agencies and other donors
- Compliance with applicable labour, tax and immigration laws
- Other regulatory requirements
- Security incident or other investigation
- Intellectual property preservation
- Litigation

6 Data Duplication

MDS UK Patient Support Group seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other business reasons it is necessary for data to be held in more than one place. This policy applies to all data in MDS UK Patient Support Group's possession, including duplicate copies of data.

7 Retention Requirements

MDS UK Patient Support Group has set the following guidelines for retaining all personal data as defined in its data privacy policy.

- **Members' personal data** will be kept for as long as there is a business need, otherwise it should be destroyed at the earliest opportunity.



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- **Website visitor data** will be retained as long as necessary to provide the service requested/initiated through the MDS UK Patient Support Group website.
- **Fundraising data** will be retained for the year in which the individual has contributed and then for as long as there is a business need after the date of the last contribution. Financial information will not be retained longer than is necessary to process a single transaction.
- **Event participant data will** be retained for the period of the event, including any follow-up activities, and for as long as there is a business need, otherwise it should be destroyed at the earliest opportunity.
- **Employee data** for both paid, consultant and volunteer workers will be held for the duration of employment and then not less than 6 years after the last day of employment. This will include
 - personal data
 - performance appraisals
 - employment contracts
 - what was paid to employees and the deductions made
 - reports made to HM Revenue and Customs (HMRC)
 - payments made to HMRC
 - employee leave and sickness absences
 - tax code notices
 - taxable expenses or benefits
 - Payroll Giving Scheme documents, including the agency contract and employee authorisation forms
 - Pension contributions and retirement benefits
- **Recruitment data**, including interview notes of unsuccessful applicants, will be held for as long as there is a business need after the closing of the position recruitment process.
- **Trustee data** will be held for the duration of service as a Trustee and for as long as there is a business need after the end of the member's term otherwise it should be destroyed at the earliest opportunity.
- **Operational data** related to the running of the charity will be held as long as there is a business need to retain it after which it should be destroyed at the earliest opportunity.

8 Data Destruction

Data destruction ensures that MDS UK Patient Support Group manages the data it controls and processes it in an efficient and responsible manner.



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When the retention period for the data as outlined above expires, MDS UK Patient Support Group will actively destroy, irrevocably anonymise or otherwise permanently obfuscate the data covered by this policy at the end of their approved retention period.

If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, he or she should identify this data to his/her supervisor and provide information as to why the data should not be destroyed.

Any exceptions to this data retention policy must be approved by MDS UK Patient Support Group's data protection officer.

In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.