

Data Retention Policy

NON-TRIVIAL VENTURES

1. ABOUT THIS POLICY

- 1.1 The corporate information, records and data of Non-Trivial Ventures is important to how we conduct business and manage employees and consultants.
- 1.2 There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.
- 1.3 This Data Retention Policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.
- 1.4 Failure to comply with this policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.
- 1.5 This policy does not form part of any employee's contract of employment, or consultant, director or officers' service agreement, and we may amend it at any time.

2. SCOPE OF POLICY

- 2.1 This policy covers all data that we hold or have control over. This includes physical data such as hard copy documents, records, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data. In this policy we refer to this information and these records collectively as "data".
- 2.2 This policy covers data that is held by third parties on our behalf, for example cloud storage providers or offsite records storage. It also covers data that belongs to us but is held by employees, consultants, directors or officers on personal devices, for example where employees, consultants, directors or officers have access to work emails on their own mobile phone connected to our systems.
- 2.3 This policy explains the differences between our formal or official records, disposable information, confidential information belonging to others, personal data and non-personal data. It also gives guidance on how we classify our data.
- 2.4 This policy applies to all employees, consultants, directors and officers of Non-Trivial Ventures in England and Wales.

3. ROLES AND RESPONSIBILITIES

- 3.1 **Responsibility of all employees, consultants, officers and directors.** We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. **All employees, consultants, officers and directors must comply with this policy, the Record Retention Schedule, any communications suspending data disposal and any specific instructions from our Chief Executive Officer. Failure to do so may subject us, our employees and contractors to serious civil**

and/or criminal liability. An employee, consultant, officer or director's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination. It is therefore the responsibility of everyone to understand and comply with this policy.

4. TYPES OF DATA AND DATA CLASSIFICATIONS

4.1 **Formal or official records.** Certain data is more important to us and is therefore listed in the Record Retention Schedule. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because it is important to the running of our business. Please see paragraph 5.1 below for more information on retention periods for this type of data.

4.2 **Disposable information.** Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this policy and the Record Retention Schedule. Examples may include:

- Duplicates of originals that have not been annotated.
- Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record.
- Books, periodicals, manuals, training binders, and other printed materials obtained from sources outside of Non-Trivial Ventures and retained primarily for reference purposes.
- Spam and junk mail.

Please see paragraph 5.2 for more information on how to determine retention periods for this type of data.

4.3 **Personal data.** Both formal or official records and disposable information may contain personal data; that is, data that identifies living individuals. Data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (the principle of storage limitation) (see paragraph 5.3 for more information on this).

4.4 **Confidential information belonging to others.** Any confidential information that an employee, consultant, director or officer may have obtained from a source outside of Non-Trivial Ventures, such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by us. Unsolicited confidential information submitted to us should be refused, returned to the sender where possible, and deleted, if received via the internet.

5. RETENTION PERIODS

5.1 **Formal or official records.** Any data that is part of any of the categories listed in the Record Retention Schedule contained in the Annex to this policy, must be retained for the amount of time indicated in the Record Retention Schedule. A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or notice to preserve documents for contemplated litigation or other special situation) calls for its

continued retention. If you are unsure whether to retain a certain record, or if you believe an exception should be made to allow a record to be retained for longer than the amount of time indicated in the Record Retention Schedule, contact us at ops@non-trivial.org.

5.2 **Disposable information.** The Record Retention Schedule will not set out retention periods for disposable information. This type of data should only be retained as long as it is needed for business purposes. Once it no longer has any business purpose or value it should be securely disposed of.

5.3 **Personal data.** As explained above, data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). Where data is listed in the Record Retention Schedule, we have taken into account the principle of storage limitation and balanced this against our requirements to retain the data. Where data is disposable information, you must take into account the principle of storage limitation when deciding whether to retain this data. More information can be found in in our [Privacy Policy](#).

5.4 **What to do if data is not listed in the Record Retention Schedule.** If data is not listed in the Record Retention Schedule, it is likely that it should be classed as disposable information. However, if you consider that there is an omission in the Record Retention Schedule, or if you are unsure, please contact us at ops@non-trivial.org.

6. STORAGE, BACK-UP AND DISPOSAL OF DATA

6.1 **Storage.** Our data must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to our business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

6.2 **Destruction.** The destruction of confidential, financial, and consultant or employee-related hard copy data must be conducted by shredding if possible. Non-confidential data may be destroyed by recycling. The destruction of electronic data must be co-ordinated with the Board.

6.3 The destruction of data must stop immediately upon notification from the Board that preservation of documents for contemplated litigation is required (sometimes referred to as a litigation hold). This is because we may be involved in a legal claim or an official investigation (see next paragraph). Destruction may begin again once the Board lifts the requirement for preservation.

7. SPECIAL CIRCUMSTANCES

7.1 **Preservation of documents for contemplated litigation and other special situations.** We require all employees, consultants, directors and officers to comply fully with our Record Retention Schedule and procedures as provided in this policy. All employees, consultants, directors and officers should note the following general exception to any stated destruction schedule: If you believe, or a member of the Board informs you, that certain records are relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until the Board determines those records are no longer needed. Preserving documents

includes suspending any requirements in the Record Retention Schedule and preserving the integrity of the electronic files or other format in which the records are kept.

7.2 If you believe this exception may apply, or have any questions regarding whether it may apply, please contact us at ops@non-trivial.org.

7.3 In addition, you may be asked to suspend any routine data disposal procedures in connection with certain other types of events, such as our merger with another organisation or the replacement of our information technology systems.

8. **WHERE TO GO FOR ADVICE AND QUESTIONS**

Questions about the policy. Any questions about retention periods relevant to your function or about this policy should be referred to us at ops@non-trivial.org.

9. **BREACH REPORTING AND AUDIT**

9.1 **Reporting policy breaches.** We are committed to enforcing this policy as it applies to all forms of data. If you feel that you or someone else may have breached this policy, you should contact our Chief Executive Officer. If you do not report inappropriate conduct, we may not become aware of a possible breach of this policy and may not be able to take appropriate corrective action.

9.2 No one will be subject to, and we do not allow, any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or co-operating in related investigations.

9.3 **Audits.** We will periodically review this policy and its procedures (including where appropriate by taking outside legal or auditor advice to ensure we are in compliance with relevant new or amended laws, regulations or guidance. Additionally, we will regularly monitor compliance with this policy, including by carrying out audits.

10. **OTHER RELEVANT POLICIES**

This policy supplements and should be read in conjunction with our other policies and procedures in force from time to time, including without limitation our:

- [Digital safety policy](#);
- [Cookies policy](#); and
- [Privacy policy](#).

Appendix 1 **DEFINITIONS**

Data: all data that we hold or have control over and therefore to which this policy applies. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data and non-personal data. In this policy we refer to this information and these records collectively as "data".

Data Retention Policy: this policy, which explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.

Disposable information: disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this policy and the Record Retention Schedule.

Formal or official record: certain data is more important to us and is therefore listed in the Record Retention Schedule. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because it is important to the running of our business. We refer to this as formal or official records or data.

Non-personal data: data which does not identify living individuals, either because it is not about living individuals (for example financial records) or because it has been fully anonymised.

Personal data: any information identifying a living individual or information relating to a living individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special categories of personal data such as health data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Record Retention Schedule: the schedule attached to this policy which sets out retention periods for our formal or official records.

Storage limitation principle: data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed. This is referred to in the UK GDPR and EU GDPR as the principle of storage limitation.

Appendix 2 **RECORD RETENTION SCHEDULE**

Non-Trivial Ventures establishes retention or destruction schedules or procedures for specific categories of data. This is done to ensure legal compliance (for example with our data protection obligations) and accomplish other objectives, such as protecting intellectual property and controlling costs.

Employees, consultants, directors and officers should comply with the retention periods listed in the record retention schedule below, in accordance with the Non-Trivial Ventures Data Retention Policy set out above.

TYPE OF DATA	RETENTION PERIOD	REASON / COMMENTS
Zoom recordings (including all fellowship-related calls such as mentoring sessions, group calls, interviews, and workshops)	Deleted by the end of the calendar year following the end of the fellowship cycle to which the recording relates (for example, recordings from the 2024 fellowship cycle will be deleted by 31 December 2025). Recordings that are subject to a preservation notice under paragraph 7 of this policy are exempt from this schedule until the notice is lifted.	UK GDPR storage limitation principle (Article 5(1)(e)). Recordings contain personal data (audio and video of participants) and should only be retained as long as necessary for the purpose for which they were made.
Data related to research fellows, scholars, and students (including applications, programme records, assessments, and correspondence)	Successful applicants: for the duration of the fellowship or programme plus six years after the end of the individual’s engagement with NTV. Unsuccessful applicants: two fellowship cycles from the date of application, to support programme evaluation and identification of returning applicants. After this period, data is deleted or anonymised.	Limitation Act 1980 (six-year limitation period for contractual and civil claims). UK GDPR Article 6(1)(f) (legitimate interest in programme evaluation and identifying returning applicants). UK GDPR storage limitation principle. Equality Act 2010 (retention of application records supports defence of potential discrimination claims).
Employee and consultant records (including contracts, payroll, personnel files, and training records)	Six years after the end of employment or engagement. Payroll records and tax-related documents are retained for a minimum of six years after the end of the tax year to which they relate.	Limitation Act 1980 (six-year limitation period for contractual claims). Income Tax (Pay As You Earn) Regulations 2003. Taxes Management Act 1970. Employment Rights Act 1996. UK GDPR storage limitation principle.

<p>Marketing information (including Mailchimp mailing lists, email campaign materials, and consent records)</p>	<p>Contact data for people who unsubscribe should be deleted promptly; a minimal suppression list (email address only) should be maintained to prevent re-contact. Campaign materials and analytics data are retained for two years from the date of the relevant campaign.</p>	<p>Privacy and Electronic Communications Regulations 2003 (PECR). UK GDPR Articles 6 and 7 (lawful basis and consent requirements). UK GDPR storage limitation principle. ICO guidance on direct marketing. Suppression list maintained under PECR to ensure unsubscribed individuals are not re-contacted.</p>
<p>NTV financial records (including accounts, invoices, tax returns, bank statements, and expense claims)</p>	<p>Seven years from the end of the financial year to which they relate. Records required to be kept permanently under the Companies Act 2006 (such as annual accounts and directors' reports) are retained for the statutory minimum period.</p>	<p>Section 386 of the Companies Act 2006 (obligation to keep adequate accounting records for a minimum of three years for private companies). Taxes Management Act 1970. VAT Regulations 1995 (six-year retention for VAT records). HMRC compliance requirements. Seven-year period provides a one-year buffer above the six-year statutory minimum.</p>