

DATA RETENTION POLICY

Policy Owner: VYN Property Ltd

Effective Date: 6th October 2025

Version: 1.0

1. Purpose and Scope

VYN Property Ltd ("the Company") is committed to protecting the personal data it processes in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy defines the principles and schedules for the retention and secure disposal of all personal data held by the Company, ensuring that data is not kept for longer than is necessary for the purposes for which it was collected.

2. Data Retention Principles

We adhere to the following core principles:

- **Lawfulness, Fairness, and Transparency:** We only retain personal data for specified, explicit, and legitimate purposes.
- **Storage Limitation:** We will not keep personal data in a form which permits the identification of data subjects for longer than is necessary.
- **Integrity and Confidentiality:** All data is stored securely and protected against unauthorised or unlawful processing, accidental loss, destruction, or damage.

3. Data Retention Schedule

The table below outlines the specific retention periods for different categories of personal data.



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Category of Data	Purpose of Holding	Retention Period	Legal Basis / Justification
Client & Investor Data (e.g., name, contact details, investment criteria from the Investor Profile Form)	To facilitate the sourcing of property deals and manage the client relationship.	7 years after the end of the business relationship or last meaningful contact.	Necessary for the performance of a contract; Legitimate interests (client management); Legal obligation (for HMRC).
Proof of Funds (POF) & Identity Documents (e.g., passport copies, bank statements)	To verify client legitimacy and financial capacity for anti-money laundering purposes.	5 years from the end of the business relationship or the date of the unsuccessful application.	Legal obligation (to comply with AML regulations).
Contractual Documents (e.g., signed NDA & Sourcing Agreements, Co-sourcing Agreements)	To evidence the terms of business and protect the Company's legal rights.	7 years after the termination or expiration of the agreement.	Necessary for the performance of a contract; Legitimate interests (enforcing contractual rights); Legal obligation (for HMRC).



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Supplier & Partner Data	To manage relationships with service providers and co-sourcing partners.	7 years after the end of the business relationship.	Necessary for the performance of a contract; Legitimate interests.
Website & Enquiry Data (e.g., contact form submissions, newsletter sign-ups)	To respond to enquiries and, where consented, for marketing communication.	2 years from last contact for enquiries; for the duration of consent for marketing (consent reviewed every 2 years).	Consent; Legitimate interests (to respond to business enquiries).

4. Data Disposal and Destruction

At the end of the retention period, or upon a valid erasure request, data will be securely and permanently destroyed to prevent its recovery.

- Digital Data: Deleted using secure deletion software or permanently removed from cloud storage and servers.
- Physical Data: Securely shredded or otherwise destroyed.

5. Policy Review

This policy will be reviewed annually or in response to changes in legislation to ensure its ongoing suitability, adequacy, and effectiveness.



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