

Puzzle Tree Academy Ltd - DATA RETENTION POLICY

Effective Date: 5 April 2025

1. Introduction

This Policy sets out the obligations of Puzzle Tree Academy Ltd (the “Company”) regarding the retention of personal data collected, held, and processed by the Company in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy does not form part of any employment contract and may be amended at any time.

The UK GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable person is one who can be identified directly or indirectly through identifiers such as name, identification number, online identifiers, or data revealing personal characteristics.

The UK GDPR also defines “special category” data (also known as “sensitive personal data”), which includes data concerning race, ethnicity, politics, religion, trade union membership, genetics, biometrics (used for identification), health, or sexual life/orientation.

Under the UK GDPR, personal data shall be kept only as long as necessary for the purpose for which it was originally collected. Individuals also have the right to erasure (the “right to be forgotten”) under specific circumstances.

This Policy outlines the types of data held, retention periods, criteria for reviewing and disposing of data, and how data will be securely deleted.

2. Aims and Objectives

This Policy aims to:

- Set appropriate retention periods for personal data;
 - Ensure data is erased when no longer needed or upon valid request;
 - Maintain compliance with the UK GDPR and the rights of data subjects;
 - Promote efficient data management practices.
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3. Scope

This Policy applies to all personal data held by the Company in:

- Third-party cloud platforms (e.g. PAGS, Go High Level via Taft Systems, Zoom, Google Workspace);
 - Company-owned computers, tablets, and mobile devices;
 - Paper files in physical storage locations.
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4. Data Disposal

When data reaches the end of its retention period or is no longer needed:

- **Electronic data** will be securely deleted, including from backups;
 - **Hardcopy documents** will be shredded and securely disposed of.
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5. Data Retention Schedule

Below is a table outlining the typical retention periods for common data types. Some retention periods are set by legal

requirements; others are based on operational need.

Type of Data	Purpose	Review Period	Retention Period / Criteria	Comments
Legal contracts	Legal compliance	Annually	6 years (or 12 years for deeds)	Required by law
Financial & tax records	Accounting	Annually	6 years	Required by HMRC
Money laundering checks	Due diligence	Annually	5 years	As required by regulation
Unsuccessful job applications	Recruitment	6 months	6 months (or as stated)	Opportunity to object given
Personnel records	Employment	Annually	6 years after employment ends	Best practice
Training records	Employment	Annually	6 years after employment ends	Best practice
Contracts of employment	Employment	Annually	6 years after employment ends	Best practice
Annual leave records	HR compliance	Annually	6 years	Allows for carry-over leave audits
Payroll records	Tax & payroll	Annually	5–6 years depending on entity	HMRC guidance
PAYE & NI records	Tax	Annually	3 years minimum	Statutory requirement
Maternity/Paternity leave records	Statutory pay	Annually	3 years after tax year ends	Legal requirement
Sickness records (SSP)	HR/payroll	Annually	3 years after tax year ends	Legal requirement
Accident/injury records	Health & Safety	Annually	3 years from report	Legal minimum
Consents (data processing)	Compliance	Annually	As long as data is processed + 6 years	GDPR accountability

Recycle bins	IT hygiene	Monthly	Automatically cleared monthly	N/A
Emails (non-sensitive)	Communications	Monthly	Reviewed & cleared regularly	Sensitive data stored separately
Google Drive documents	Form data & storage	Quarterly	Kept only while active	Linked to specific consent
Zoom registrations	Event access	Quarterly	Deleted after 6 months	Registration email only
Call recordings	Record-keeping	As needed	Retained 6 months unless required	N/A
CRM data	Client management	Annually	Retained while active + 2 years	Reviewed periodically
Customer complaints	Service monitoring	Annually	3 years minimum	For quality and protection
Data protection requests	GDPR rights	Annually	2 years from date of request	Legal best practice

Note: Where specific timeframes are not yet in place (e.g., Dropbox, Live Chat), these will be reviewed and added as new tools are used. Data will not be retained indefinitely without purpose.

6. Roles and Responsibilities

Data Protection Officer: Olga Pavloviciene
 Email: olga@puzzletreeacademy.com

The DPO is responsible for implementing and monitoring this policy, ensuring compliance, and addressing any data retention queries.

7. Implementation of Policy

This policy is effective from **5 April 2025**. No part of this policy is retroactive. It applies only to data collected on or after this date.

Approved by: Olga Pavloviciene

Position: Data Protection Lead

Date: 5 April 2025

Review Date: 5 April 2026

Signature: Olga Pavloviciene



Puzzle Tree Academy Ltd is committed to managing personal data responsibly and with respect.