

APPENDIX – Retention and further Details.

1. Introduction

- This document is the PPL/PHAL Records Review and Retention Schedule. It tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it. All agreed records reviews and retention details will be published in this document only.

2. Purpose of review and retention schedule

- All records created by PPL/PHAL be they electronic, paper or any other media must have a review and retention period assigned to them. This must cover them from creation through to final disposition. Electronic records also include any e-mail that is created and held by PPL/PHAL as evidence of a business activity.
- The review period specifies how long a record should initially be retained for before it is reviewed to decide whether it needs to be kept for justified further use, destroyed or is of public interest that it should be retained and available via the Ports archives.
- Reviewing records assists in the specific requirements to properly manage all records created in accordance with PPL/PHALs policies and legislation. Reviews ensure that records no longer required are properly destroyed. However, it is also used to prevent the premature destruction of records and to identify those records worthy of permanent preservation.
- The review period assigned depends on legal, financial or administrative reasons which is why there are differencing period lengths. Some records may need to be retained indefinitely because of legal requirements or historical value.
- The retention of unnecessary records may contravene legislation such as the Data Protection Regulation 2018, which could have serious financial and reputational consequences for PPL/PHAL and may well involve investigation by the Information Commissioners Office (ICO).
- PPL/PHAL will take regular reviews of data held and deal with in the appropriate manner.

3. More information about your ordinary personal data

Type of data held by us	What we use it for	Legal ground	Guideline retention period
Biographical details (including name, title, contact details, DOB, emergency contacts, photograph)	Administration of the contract, emergency contact details so we can look after your welfare in an emergency, DOB for admin records, photograph for ID badges and on intranet/web to help colleagues/customers/ security to identify you.	Legal obligation Performance of the contract In our legitimate interest to hold emergency contact details in order to inform a person nominated by you in an emergency situation. In our legitimate interest to use photographs to help colleagues/customers/ security to identify you.	Emergency contacts, photograph: during employment or during entry conditions/contract /lease with Port up to 6 months after contract expires or longer if required by Statutory law.

Health and safety	Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment; keeping required records;	Legal obligation In our legitimate interest to ensure Employees are able to perform their duties in a safe environment for the efficient operation of the business	Decided on a case by case basis in accordance with the criteria set out in this Privacy Notice, in particular any legal requirement to retain particular records
CCTV footage	For security purposes, although we may also use CCTV footage when investigating allegations of misconduct or to act as Health and Safety procedure for the Port.	Legal obligation Performance of the contract In our legitimate interest to deal effectively with allegations of misconduct and to maintain the security and health and safety of our premises	Data retained for 30 days or indefinite for legal purposes each on a case by case basis
Personal data produced by you and others in the course of carrying out the work e.g. business cards, job-related emails (incoming and outgoing), minutes of meetings, written reports, business quotes, business social media presence etc.	Performance of job duties by you and your colleagues; carrying on the business of the company; monitoring your business social media presence to ensure you comply with standards expected	Performance of the contract In our legitimate interest to carry out the company business	Decided on a case by case basis.
Personal data, which may include any of the types of data set out in this Appendix, that is relevant to our strategic decision-making processes, to planning business operations, which include but are not limited to leases and contracts, actual and potential legal claims, corporate reporting and business risk analysis	To enable us to carry out the company business, analyse current business performance, plan for the future, present information in reports to relevant audiences such as shareholders, protect the company from legal claims, seek professional advice as and when required in the course of running our business	Legal obligation Performance of the contract/lease In our legitimate interest to carry out the company business, including taking strategic decisions in the interest of the business, communicating about the business with relevant audiences and seeking professional advice where appropriate	Decided on a case by case basis but may be up to 10 years to refute any litigation claims with in leases/contracts.
Marketing material and relevant customer lists	To enable us to contact customers with relevant information to help them make cost affective and/or relevant business decisions.	To contact our customers within GDPR.	On a case by case basis or by customer request.

Debit card and credit card details	Payments	Payment Card Industry (PCI) standard. Destroy using confidential waste system.	6 months
Accident forms and reports for Health and Safety	H&S	All accidents recorded on Health and Safety Management System	Current + 6 years
Risk Assessments	H&S	Management of Health and Safety at Work Regulations 1992, regulation 3 Risk assessment	Indefinite
COSHH & other substance assessments	H&S	Control of Substances Hazardous to Health Regulations 2002	10 years from date of last known exposure or 40 years if exposure may result in infection
Possession of explosives	H&S	Control of Explosives Regulations 1991	3 years from date of last entry
Asbestos, compressed air, hazardous substances, lead exposure inspection records & register	H&S		40 years
Fire	Fire safety arrangements	Regulatory Reform Fire Safety Order 2005	Permanent
Emergency Procedures; Fire Regulations/Equipment			Until superseded
Surveys/inspections			10 years or earlier if superseded
Listed Buildings Information & Issues		Planning (Listed Building and Conservation Area) Act 1990	Permanently
Framework Agreements			Current year + 6 Months
Alarm systems; Door entry systems.		Limitation Act 1980	Current year + 6 years
Licenses (various types)			Life of license, but must be reviewed regularly.

Insurance policy certificates and schedules		Limitation Act 1980	Current year + 40 years
Settled claims – Employers & Public Liability Claims	Legal	Industry standard	Current year+ 5 years

4. More information about how we share your personal data

Who we share your personal data with	What data we share	Why we share it	Legal ground
Within the Portland Port Group	Any of your personal data that is relevant	To make business decisions connected with your career and pay and benefits. To manage the company's or group's business To monitor company performance To provide system maintenance support and hosting of data	Legal obligation Performance of the contract In our legitimate interest to manage the business and Employee performance
Any third-party service providers such as: IT support provider, online payments, Newsletter Documentation outlets.	Data that may be shared such as; Email address, payment details, IT related information such as IP address.	To enable Us to carry out Port and customer Services.	Performance of contract in our legitimate interest to engage appropriate service providers to manage all of The Portland Group Services.
Our legal and other professional advisers appointed from time to time such as, but not limited to, auditors, solicitors, government bodies.	Any of your personal data that is relevant for Port services or legal requirements.	To obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other Employees; to obtain advice on business management and planning, including accounting advice; to independently audit our	Legal obligation Performance of contract In our legitimate interest to seek professional advice to clarify our rights/obligations and appropriately defend ourselves from potential claims; to manage the business and its finances (including defending legal claims).

		accounts	
Potential purchasers/new service providers	Any of your personal data that is relevant To all Port Services, tenants, contracts, service providers.	To provide relevant information to prospective purchasers or new service providers in the event of a possible business transfer, a business or share sale, takeover or other corporate transaction	Legal In our legitimate interest to consider/proceed with a transfer/sale of the business and information is required by prospective purchasers.
Customers, potential customers, shareholders and interested parties	Any of your personal data that is relevant, including in particular business and contact details.	Inclusion in corporate reports, for use in business communications, to obtain security clearance to work on customers' premises	Legal obligation In our legitimate interest to communicate about the business and our Employees to appropriate audiences, which include customers, potential customers, shareholders and other interested parties