



PCA Data Retention Policy

May 2018



PUBS CODE ADJUDICATOR

DATA RETENTION POLICY

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1. Introduction

The General Data Protection Regulation (GDPR) takes effect from 25 May 2018. The Pubs Code Adjudicator (PCA) complies with the data processing principles in Article 5 GDPR, including processing lawfully and fairly; for specified legitimate purposes, and not processed in a manner that is incompatible with those purposes and that is adequate, relevant and limited to what is necessary in relation to the processing purpose.

The PCA processes personal data in accordance with its [privacy notice](#). We minimise data retention and have clear procedures in place to determine how and when to dispose of personal data. This policy explains the criteria by which decisions relating to retention and disposal are set.

2. Personal data processing

The PCA processes data in three main areas: business activities, interactions with stakeholders, and in connection with staff records.

3. Review and Retention periods

In compliance with Article 5 GDPR the PCA retains personal data only for so long as it is needed for specified purpose or purposes not incompatible with the specified purpose. The PCA considers the personal data it processes in three main periods:

- three years
- eight years
- eighteen years

Information processed in connection with the PCA's business activities (including in relation to its public tasks and any legal obligations, including financial obligations) are reviewed upon eight years from the last action on file, when it will be reviewed with a view to disposal or a further specified retention period for consideration of transfer to the National Archive for archiving purposes.

Personal data relating to other stakeholder interactions will be reviewed after three years from date of last interaction.

Personal data processed in connection with staffing will be returned to the member of staff's home department within one month of the end of secondment. Personal data will be retained for a period of twelve months following the return of data to the home department. Following confirmation of receipt of records from the home department personal data will be destroyed.

When reviewing, to determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

4. Archiving

The PCA is an office, commission or other body or establishment under the Crown pursuant to paragraph 2(1)(b) of Schedule 1 to the Public Records Act 1958. As such the PCA is a Public Records body and is bound by that Act. The PCA archives Public Records and consults The National Archive as appropriate in connection with records relating to its public functions.

5. Updating this statement

The PCA may update this GDPR policy by publishing a new version which will also be posted on this website.

6. PCA Contact

If you have any questions about the PCA's management of your personal information, please write:

- by email to office@pubscodeadjudicator.gov.uk; or
- by post to Office of the Pubs Code Adjudicator

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23 Stephenson Street
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