



Golders Hill Health Centre

Golders Hill Data Retention Policy

1. Introduction

This Policy sets out the obligations of the Golders Hill Health Centre, Hillside 151 North End Road, London NW11 7HT (“the Company”) regarding retention of personal data collected, held, and processed by the Company in accordance with EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).

In addition, the GDPR includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

- a) Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
- b) When the data subject withdraws their consent;
- c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
- d) When the personal data is processed unlawfully (i.e. in breach of the GDPR);
- e) When the personal data has to be erased to comply with a legal obligation; or



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f) Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Company, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to the Company's Data Protection Policy.

2. Aims and Objectives

2.1 The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subjects' rights to erasure, are complied with. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the GDPR.

2.2 In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Company, this Policy also aims to improve the speed and efficiency of managing data.

3. Scope

3.1 This Policy applies to all personal data held by the Company and by third-party data processors processing personal data on the Company's behalf.

3.2 Personal data, as held by the Company is stored in the following ways and in the following locations:

- a) The Company's servers, located in London at Amazon S3;
- b) Third-party servers, operated by The Tomorrow Lab and located in Digital Ocean's London Data Centre;
- c) Laptop computers provided by the Company to its employees.

4. Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:



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4.1 Personal data stored electronically (including any and all backups thereof) shall be deleted

4.2 Special category personal data stored electronically (including any and all backups thereof) shall be deleted securely

4.3 Personal data stored in hardcopy form shall be shredded;

4.4 Special category personal data stored in hardcopy form shall be shredded.

5. Data Retention

5.1 As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

5.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

5.3 When establishing and/or reviewing retention periods, the following shall be taken into account:

- a) The objectives and requirements of the Company;
- b) The type of personal data in question;
- c) The purpose(s) for which the data in question is collected, held, and processed;
- d) The Company's legal basis for collecting, holding, and processing that data;
- e) The category or categories of data subject to whom the data relates;

5.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.



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5.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

5.6 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.



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Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Current members	Members' overall records	Membership administration	Annual	Continuous during membership	
Post membership	Membership details	Membership administration	Annual	Archived on relinquishing membership for 5 years	Archived for 5 years
Appraisal record	Appraisal details	Details of appraisal	Annual	10 years	Archived for 10 years
Designated body record	Record of revalidation	GMC requirement	Annual	15 years	Archived for 15 years
Records of concern	Record of incidents relating to warnings, undertakings and conditions	GMC requirement	Annual	5 years	Archived for 5 years
Other concerns	Record of Appraisal Action concerns, local concerns and other concerns	GMC requirement	Annual	15 years	Archived for 15 years
Events Records	Dates and event type, booking and attendee details	CPD verification	Annual	5 years	Archived for 5 years
Fitness to practice record	Record of GMC fitness to practice proceedings	GMC requirement	Annual	10 years	Archived for 10 years
Corporate sponsor	Corporate Sponsors' overall records	Verification of membership	Annual	Continuous during membership	Archived for 2 years
Message Board	Information for members	Communication to membership	Annual	Transferred to archive when message nonapplicable anymore	Archived for 6 months
Discussion forum	Members comments	Membership communication channel	Annual	2 years from date of inception	Archived for 2 years
System Generated Email Log	Details of emails sent	Communication to membership	Annual	3 years from date of email	Archived for 3 years



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6. Roles and Responsibilities

6.1 The Company's Data Protection Manager is the CEO, currently Susan Smith

6.2 The Data Protection Manager shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with the GDPR and other applicable data protection legislation

6.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods throughout the Company

6.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Manager

7. Implementation of Policy

This Policy shall be deemed effective as of May 25th 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.