

THE CATENIAN ASSOCIATION BENEVOLENT & CHILDREN'S FUND

Registered in England: Charity number 214244

GENERAL DATA PROTECTION REGULATIONS 2018

RETENTION POLICY

Personal information is held in individual paper and electronic files.

A file is retained as an open file for as long as an application is under consideration or a loan has been made and is outstanding.

A file is archived when an application is withdrawn, declined, a grant paid or a loan previously made is repaid. An archived file will be re-opened only if a further application is received or a request for information is received.

An archived file is retained as long as the applicant remains eligible for further help from the Benevolent Fund or for ten years whichever is earlier. Otherwise, the file will be destroyed four years after the last transaction on the file, or four years after the applicant's death or cessation of membership of the Catenian Association; whichever is the earlier.

Open paper files are held under lock and key at the office of the Clerk to the Trustees. Archived paper files are held under lock and key at the Catenian Head Office. In both cases only the Clerk and the Chairman of Trustees have access.

Electronic files are held on a computer under the control of the Clerk and which is kept under lock and key when not in use.

Back-up copies are taken regularly of all electronic files and are held on portable storage media (currently encrypted USB drives). A back-up copy is taken at the end of each financial year (31st March) and held for four years. Intermediate copies are taken and recycled at regular intervals. All back-ups are stored either temporarily at the Clerk's office or in a lockable fireproof safe at Catenian Head Office. The USB sticks are used solely for this and no other purpose and are encrypted to FIPS standards.

Information is held under the following categories of data:

- Personal information about the applicant;
- Personal information about the applicant's dependants;
- Information about the applicant's financial circumstances;
- Transactional data (payments of grants and loans and repayments received) including bank details.

There is no difference in retention policy between the categories of information held.

Paper files are destroyed by confidential shredding through a contract arranged by Catenian Head Office.

Electronic files are destroyed by permanent deletion of the files and physical destruction of storage media when no longer required or obsolete.

February 2018