Rescon Ltd
Records Management Policy

Revision History

Version	Revision Date	Summary of Changes	Author
1.0	14/08/2018	Document creation	Tom Dawson

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1. Summary

Information records must be effectively managed, with procedures in place to provide a robust framework for information management. This policy outlines the processes implemented for records management including data retention, archive and deletion.

2. Scope

This document sets out the policy for records management including data retention, archive and deletion.

3. Responsibilities

The Information Governance Lead is responsible for records retention and disposal.

4. Data Retention

Service Provider (Rescon) as Data Controller
In accordance with the General Data Protection Regulation (GDPR):

Anonymised and pseudonymised data will be retained indefinitely by Rescon for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes (Article 17 – 3d); and

Personal data will be retained for seven years post either the confirmed death of a data subject, or 150 years from date of birth, as processing is necessary for the purposes of medical diagnosis or the provision of health or social care treatment (Article 17 – 3c); compliance with legal obligation (Article 17 – 3b); and the establishment, exercise or defence of legal claims (Article 17 – 3e).

Customer As Data Controller

For as long as the Customer has a license, they will have access to the data relating to their users on Rescon systems. Data retention will mirror the Customer's policy. Once the Customer's license expires or in the event of an agreement being terminated, Rescon will return all data that has been processed to the Customer prior to deletion of this data. All Customer accounts and data held on Rescon systems will be deleted as long as there is no reason to hold onto the data for potential future legal defence, in which case Rescon will only keep the data that may be used for that legal defence.

There is no minimum retention period as this will vary based on the Customer's data retention policy.

Records retained for legal purposes will be retained for a maximum of 15 years post contract end.

5. Data Archive

Service Provider as Data Controller

Once a data subject's contract with the service provider has expired through any method including revoking permissions or confirmed death records will be transferred to an archive in the database and not be accessible through the Lincus system. The archive database is backed up in a separate physical location. These records will be held as per Rescon's data retention policy in section 4 above.

Data will also be moved to the archive following a request from the Data Subject using the Data Deletion Request Form. Requests for data archive can be made by emailing Lincus administrator (info@lincus.eu) or Data Protection Officer (dpo@lincus.eu), through the feedback button on Lincus or contact form on our website.

Customer As Data Controller

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Data will only be archived If it may be needed for potential future legal defence, in which case Rescon will only archive the data that may be potentially used for that legal defence.

Archived data will be transferred to an archive in the database and not be accessible through the Lincus system. The archive database is backed up in a separate physical location. Archived records will be held as per Rescon's data retention policy in section 4 above.

6. Data Deletion

6.1 Types of Data Deletion

Service Provider as Data Controller

Records are not permanently deleted, they are moved to an archive database and deleted from the main database. When records are deleted, these accounts must be held in archive and not be accessible in any way.

Customer As Data Controller

If the Customer is the Data Controller, the Service Provider (Rescon) must return all data to the Customer in CSV format. These accounts must be completely deleted as long as there is no reason to hold onto the data for potential future legal defence.

In the event of an agreement being terminated or license expiration, the Service Provider must return all data that has been processed to the Customer. This will be provided to the customer in CSV format. The Service Provider will charge hourly cost rate to extract and delete the data. The Customer must complete the Data Deletion Request Form to authorise transfer and deletion of the data. These accounts will be completely deleted apart from any data that needs to be retained for potential future legal defence.

6.2 Data Deletion Mechanism

Data will be deleted using overwrite and latest available secure deletion methods followed by the removal of the mapping from the public name to the object immediately. Once the mapping is removed, there is no remote access to the deleted object, which was overwritten prior to deletion.

4. Review & Monitoring

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info@rescontechnologies.com
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This policy must be reviewed and approved at least annually. Compliance with the Records Management Policy will be monitored with at least annual audits and ongoing monitoring by the Information Governance Committee.

5. Policy Approval

This policy has been reviewed and approved.

Name: Tom Dawson

Position: Managing Director and IG Lead

Date: 10/03/2019

Signature: 

Appendix A: Data Transfer and Deletion Form

For completion by Customer:	
Date:	
Requested by:	
Details of request:	
Reason for request:	
Additional comments:	
Customer authorisation:	
Name:	
Position:	
Signature:	
Additional comments:	

For completion by Service Provider:	
Date:	
Name:	
Is the customer the data controller?	
If answered no to the above question, data **must** be archived and **must not** be permanently deleted	

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Transfer/deletion required:	
Process for transfer/deletion:	
Cost of transfer/deletion:	
Transfer/deletion to be completed by:	
Additional comments:	
Service Provider authorisation:	
Name:	
Position:	
Signature:	
Type of transfer/deletion authorised:	

For completion after transfer/deletion:	
Date of transfer/deletion:	
Transfer/deletion completed by:	
Details of transfer (method of transfer and who it was sent to):	
Details of deletion (if applicable):	
Details of customer notification:	
Additional comments:	

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