

Pursuant to the SRA Code of Conduct 2011 the firm must have a system in place which ensures documents are kept safely and which can be monitored. It is a requirement of the GDPR and Data Protection legislation that personal data must be kept for no longer than necessary and that we inform individuals as to how long we intend to keep their personal data and when it will be destroyed. It is also a requirement of our ISO 27001 certification that we destroy information when it is no longer necessary to keep it.

The firm operates detailed procedures for the long-term archiving and destruction of client files and business support documents.

This document sets out general guidance, at a summary level only, on the length of time we keep data and documents and how that period will be determined. This guidance is for users of the firm's website.

### **Client Files**

Clients will be told at the start of a matter when the documents on that matter will be destroyed. This will be set out in the engagement letter and will be informed by the firm's policy on destruction dates. This will be not less than 7 years from the date the client matter is closed.

As stated above, the firm operates detailed procedures for the long-term archiving and destruction of closed client files (i.e. hard copy papers and electronic documents (e-Documents) on closed matters) as well as Deeds, Wills and other documents

All closed matters and other documents (hard copy papers and e-documents) have a destruction date allocated to them i.e. the date when we must destroy documents and not before. Documents are destroyed securely and confidentially in accordance with that destruction date.

Destruction dates are primarily based upon the likelihood of the firm needing to refer to the documents again, as informed by limitation periods or the nature of the transaction covered by the client matter.

Certain items of information about client matters may be retained for longer periods of time for legal and regulatory reasons e.g. as part of our accounting records or for conflict checking purposes etc.

### **Prospective Clients**

If a prospective client contacts the firm and is given advice in an initial telephone call or email or meeting but the matter is not taken further and no matter file is opened, the matter is treated as a closed client matter and any written or electronic records of the advice given will be deleted no later than 7 years after initial contact.

### **Marketing and Business Development (BD)**

BD client and contact data that is kept in the firm's Client Relationship Management (CRM) system for marketing purposes and which has been added to the system because we are entitled to within our legitimate interests e.g. where the individual is employed by a corporate client of the firm, or because data has been added via the soft opt-in consent permission i.e. where an individual has instructed us and clearly chosen not to object to receiving marketing materials when we collected their data, will be retained for 5 years. At that point, we will then review our current relationship with the individual and remove details for any inactive clients or contacts e.g. where an individual has not attended an event or clicked on a link in any email or instructed us for a number of years.

BD client and contact data is kept in the firm's CRM system because we have that individual's express consent for the firm to keep their data for marketing purposes. We will re-confirm consent every 2 years (e.g. asking the individual to confirm which areas of the business they want to continue to receive information or newsletters about) or delete the data.

Client feedback forms or surveys are kept for 12 months and any personal information contained in them is deleted.

Clients or contacts whose details are kept in the firm's CRM system can unsubscribe or ask for their details to be removed from the system at any time if they wish.

Event feedback forms are kept for 18 months then deleted.

Event data (e.g. dietary requirements) will be deleted after an event.

For individuals who have asked to unsubscribe from marketing communications, the 'unsubscribe' list will be kept indefinitely with minimal information to ensure no marketing is sent to those individuals.

### **Human Resources**

All applications for vacancies or speculative applications (along with related correspondence) sent to the firm are kept for 12 months after receipt of the application or, where the firm has first secured consent to retain, for a longer period. Any such consent will be re-confirmed every 6 months thereafter and, if not received, the record is destroyed. Records relating to individuals taken on by the firm are retained in line with the firm's employment policies.

Graduate recruitment applications (and related correspondence / other documents) are kept for 2 years after receipt of application or, where the firm has first secured consent to retain, for a longer period. Any such consent will be re-confirmed every 12 months thereafter and, if not received, the record is destroyed. Records relating to individuals taken on by the firm are retained in line with the firm's training / employment policies.

### **Digital Recordings of telephone conversations with the Commercial Recoveries team**

If a telephone call is made to or from the firm's Commercial Recoveries team, the telephone call may be recorded for training and monitoring purposes. The digital recording of the call will be kept for no less than 12 months from the date of the call and it will only be kept longer if the content of the call becomes relevant to the matter we are instructed to act on. In that scenario, the recording will be retained in accordance with the Client Files section of this Policy Summary.

### **CCTV**

CCTV images are kept for no more than 60 days from the date of the images, depending on which of the firm's offices an individual visits.

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