

The Kimberley

HOTEL HARROGATE

Retention of Personal Data Policy-GDPR- Customers

Introduction

GDPR regulates the management and retention of personal data.

The regulations do not set out a minimum or maximum period for which personal data needs to be retained. However it does state that any personal data which is processed for any purpose shall not be kept for longer than is necessary for that purpose.

As such, it is advised that businesses should:

- Review the length of time that personal data is kept;
- Consider the purpose for which such information is held in order to ascertain how long it should be retained;
- Ensure the information is securely deleted when it is no longer needed for the purpose it was processed for;
- Ensure all information which goes out of date is securely deleted, updated or archived.

Please note that discarding information too early may be unwise and cause the business problems. Nevertheless, there are risks related to retaining information for longer than necessary in that the risks of information going out of date, being inaccurate or being lost are increased.

Whilst you are in possession of such information, you have a duty to ensure that it is kept safely and you must be willing and able to respond to subject access requests for any personal data which is held.

The Company should regularly review the personal data which it holds and destroy anything that is no longer required. Any data which does not need to be accessed regularly but is still required should be safely archived. Therefore consideration should be given to the following points when deciding the retention periods:-

- What is the current and future value of the information. Is there a valid reason to retain such information for more than 12 months;
- What are the costs, risks and liabilities linked with retaining the information;
- What are the logistics behind making sure the information remains accurate and up to date;
- What are the potential liabilities should the information be lost or accidentally leaked.

Destroying Data

Once the information is no longer required then it should be reviewed and destroyed confidentially. A clear record should be made of the information which should be destroyed. Once authorisation has been received to destroy the information this should be destroyed as soon as possible.

Customer Data Retention Period

Customer Data	Retention Period
Name, Telephone and Address details	Period from booking to 28 days after departure unless another booking is made in the intervening period.
Credit/Debit Card Details	Destroyed immediately after use for security purposes.
Email Address	Subject to individual 'opting-in' email will be used for marketing purposes indefinitely unless individual 'opts-out' which will be made available at every opportunity.

April 2018