

DATA RETENTION SCHEDULE

This Data Retention Schedule sets out the time periods that different types of (employment-related) business records must be retained for business and legal purposes. This is a relatively lengthy document listing the many types of employment-related records used by Anomali Limited and the applicable retention periods for each record type.

The retention periods are based on business needs and legal requirements. If you maintain any types of records that are not listed in this Schedule, and it is not clear from the existing record types in this Schedule what retention period should apply, please contact privacy@anomali.com for guidance.

Any deviation from the retention periods in this Schedule must be approved in advance by privacy@anomali.com

1 Employment records

1.1 Personnel records

Record	Recommended period	Storage format	Reference
Rejected job applicant records, including: <ul style="list-style-type: none"> Contact details; Application letters or forms; CVs; References; Certificates of good conduct; Interview notes; Assessment and psychological test results. 	<p>Twelve months after applicant is notified of rejection or as long as you have a clear business need for this information to be retained.</p> <p>NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.</p>	Paper or electronic	Paragraph 5.3.7 of the Fair Employment in Northern Ireland Code of Practice
Application records of successful candidates, including: <ul style="list-style-type: none"> Application letters or forms; Copies of academic and other training received; References; 	<p>Six years after employment ceases.</p> <p>NOTE: If litigation is anticipated these records must</p>	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989

DATA RETENTION SCHEDULE

Record	Recommended retention period	Storage format	Reference
Correspondence concerning employment; CVs; Interview notes and evaluation forms; Assessment and psychological test papers and results.	be kept until the litigation is disposed of.		
Criminal records information: Criminal records requirement assessments for a particular post; Criminal records information forms; Access NI check forms (basic and enhanced); Access NI certificates; Disclosure and Barring Service check forms.	Criminal records requirement assessments for a particular post - <u>12 months</u> after the assessment was last used. All other information in this category - as soon as practicable after the check has been completed and the outcome recorded (i.e. whether satisfactory or not) unless, in exceptional circumstances the privacy@anomali.com assesses that it is clearly relevant to the ongoing employment relationship in which case, <u>six months.</u>	Paper or electronic	DBS guidance for employers: Duration of criminal record check validity Access NI – Code of Practice Part 1.7.4 if the ICO Code of Practice dated November 2011
Employment contracts, including: Personnel and training records; Written particulars of employment; Changes to terms and conditions.	<u>Six years</u> after employment ceases, unless document executed as a deed, in which case <u>12 years</u> after employment ceases. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Article 4 and Article 15 of the Limitation (Northern Ireland) Order 1989
Directors' service contracts and any variations	<u>Six years</u> from termination or expiry of the contract, unless executed as a deed, in which	Paper or electronic	Article 4 and Article 15 of the Limitation (Northern

DATA RETENTION SCHEDULE

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	<p>case 12 years from termination or expiry.</p> <p>NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.</p>		<p>Ireland) Order 1989</p> <p>Section 227 and Section 228 of the Companies Act 2006</p>
Copies of identification documents (e.g. passports)	Not less than two years from date of termination of employment.	Paper or electronic	Article 6(1)(b) of the Immigration (Restrictions on Employment) Order
Identification documents of foreign nationals (including right to work)	Not less than two years from date of termination of employment.	Paper or electronic	Article 6(1)(b) of the Immigration (Restrictions on Employment) Order
Records concerning a temporary worker	<p>Six years after employment ceases.</p> <p>NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.</p>	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989
Employee performance and conduct records, including: <ul style="list-style-type: none"> Probationary period reviews; Review meeting and assessment interviews; Appraisals and evaluations; Promotions and demotions. 	<p>Six years after employment ceases.</p> <p>NOTE: If litigation is anticipated these records must</p>	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989

DATA RETENTION SCHEDULE

Record	Recommended retention period	Storage format	Reference
	be kept until the litigation is disposed of.		
Records relating to and/or showing compliance with Working Time Regulations 1998 including: Registration of work and rest periods; and Working time opt-out forms.	<u>Two years</u> from the date on which the record was made. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Regulation 11 of the Working Time Regulations (Northern Ireland) 2016.
Redundancy records	<u>Six years</u> from date of redundancy. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989
Annual leave records	<u>Six years</u> after the end of each tax year. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989
Parental leave records	<u>Six years</u> after the end of each tax year. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989
Sickness records	<u>Six years</u> after the end of each tax year. NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989

DATA RETENTION SCHEDULE

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Records of return to work meetings following sickness, maternity etc.	<p>Six years the end of each tax year.</p> <p>NOTE: If litigation is anticipated these records must be kept until the litigation is disposed of.</p>	Paper or electronic	Article 4 of the Limitation (Northern Ireland) Order 1989
Fair Employment Monitoring: <ol style="list-style-type: none"> 1. Written information relating to employee monitoring. 2. Written information relating to applicant monitoring. 	<p>Three years from the date on which the individual to whom the information relates ceases to be employed.</p> <p>Three years after the application is made.</p>	Paper or electronic Paper or electronic	Reg 17 of the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999 Regulation 18 of the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999

1.2 Payroll and salary records

Record	Recommended retention period	Storage format	Reference
Records for the purposes of tax returns including wage or salary records, records of	Six years.	Paper or electronic	Section 12(b) of the Taxes Management Act, 1970

DATA RETENTION SCHEDULE

Record	Recommended retention period	Storage format	Reference
overtime, bonuses and expenses			Schedule 18, paragraph 21 of the Finance Act 1998
Pay As You Earn (PAYE) records, including: Wage sheets; Deductions working sheets; Calculations of the PAYE income of employees and relevant payments.	<u>Three years</u>	Paper or electronic	Regulation 97 of the Income Tax (Pay As You Earn) Regulations 2003, SI 2003/2682
Income tax and national insurance returns, income tax records and correspondence with HMRC	<u>Three years</u> after the end of the financial year to which they relate.	Paper or electronic	Regulation 55 of the Income Tax (Employments) Regulations 1993 as amended.
Records demonstrating compliance with national minimum wage requirements	<u>Three years</u> beginning with the day upon which the pay reference period immediately following that to which they relate ends.	Paper or electronic	Regulation 59 of the National Minimum Wage Regulations 2015, SI 2015/621
Details of benefits in kind, income tax records (P45, P60, P58, P48 etc.), annual return of taxable pay and tax paid.	<u>Six years</u> (please note that the general time limit under the Taxes Management Act 1970 is now four years).	Paper or electronic	Taxes Management Act 1970
Employee income tax and national insurance returns and associated HMRC correspondence	<u>Three years</u> from end of tax year to which they relate.	Paper or electronic	Regulation 97 of the Income Tax (Pay as You Earn) Regulations 2003, SI 2003/2682
Statutory sick pay (SSP) records	At least <u>three months</u> after period of sick leave ends or <u>6 years</u> if concerned about breach of contract claim.	Paper or electronic	The Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014 abolished the need

DATA RETENTION SCHEDULE

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			<p>to keep SSP records for three years.</p> <p>However, employers still have to keep sickness records in accordance with business needs.</p> <p>Article 4 of the Limitation (Northern Ireland) Order 1989</p>
Wage or salary records (including overtime, bonuses and expenses)	<u>Six years</u>	Paper or electronic	Section 43 of the Taxes Management Act 1970
Records relating to hours worked and payments made to workers	<u>Three years</u>	Paper or electronic	<p>Section 9 of the National Minimum Wage Act 1998</p> <p>Regulation 59 of the National Minimum Wage Regulations 2015</p>
Statutory maternity, paternity and shared parental pay records, calculations, certificates or other evidence	<u>Three years</u> after the end of the tax year in which the period of statutory pay ends.	Paper or electronic	Regulation 26 of the Statutory Maternity Pay (General) Regulations (Northern Ireland) 1987

2 Health and safety records

Record	Recommended retention period	Storage format	Reference
Records of reportable injuries, diseases or dangerous occurrences: Reportable incidents;	<u>Three years</u> from date of the entry.	Paper or electronic	Regulation 7 of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (Northern Ireland) 1997

DATA RETENTION SCHEDULE

Record	Recommended retention period	Storage format	Reference
Reportable diagnoses; Injury arising out of accident at work.			
Lists or register of employees who have been exposed to asbestos dust, including health records of each employee	40 years from the date of the last entry made in the record.	Paper or electronic	Regulation 22 of the Control of Asbestos Regulations (Northern Ireland) 2012
Medical records and details of biological tests under the Control of Lead at Work Regulations	40 years from the date of the last entry made in the record.	Paper or electronic	Regulation 10 of the Control of Lead at Work Regulations (Northern Ireland) 2003
Medical records as specified by the Control of Substances Hazardous to Health Regulations (Northern Ireland) ('COSHH')	40 years from the date of the last entry made in the record.	Paper or electronic	Regulation 11(3) of the Control of Substances Hazardous to Health Regulations (Northern Ireland) 2003
Records of monitoring of exposures to hazardous substances (where exposure monitoring is required under COSHH)	Where the record is representative of the personal exposures of identifiable employee: 40 years from the date of the last entry made in the record. Otherwise, five years from the date of the last entry made in the record.	Paper or electronic	Regulation 10(5) of the COSHH 2003
Records of tests and examinations of	Five years from the date on which the record was made.	Paper or electronic	Regulation 9(4) of the COSHH 2003

DATA RETENTION SCHEDULE

Record	Recommended retention period	Storage format	Reference
control systems and protective equipment under COSHH			
Medical records under the Ionising Radiations Regulations	Until the person to whom the record relates reaches or would have reached 75 years of age, but in any event for at least <u>30 years</u> from the date of last entry.	Paper or electronic	Regulation 25(2)(c) of the Ionising Radiations Regulations (Northern Ireland) 2017