

# Poppy Austin Limited – Data Retention Policy

Updated: 1st April 2018

This policy sets out what information Poppy Austin holds, how long we hold it for and when it will be deleted.

It also covers the procedure to follow regarding data requests.

- Information held by us
- How long is personal data held for?
- Where is personal data held?
- How is personal data deleted?
- Access to personal information, correction and deletion

## **Information held by us**

We retain information about the following:

- 1) Prospective customers
- 2) Existing customers
- 3) Staff and consultants
- 4) Product and service suppliers
- 5) Members of the public not falling into the categories of 1-4

## **How long is personal data held for?**

We aim not to hold personal data longer than necessary.

### Prospective and existing customers

We retain the data for 1 year or for as long as we continue to provide a legitimate business relationship with the subject. Data is deleted earlier upon request by a subject invoking the Right to Erasure.

### Staff and consultants

We retain staff records indefinitely on our accountancy system, purely for the purpose of processing payroll and other legitimate employer correspondence.

The information is shared only with HMRC, our bank and pension provider. We retain employee data, both current and past, in accordance with regulation set by HMRC. We delete past employee details upon request and approval by HMRC.

Consultancy invoices are kept for 6 years, in line with HMRC requirements regarding company accounts.

### Product and service suppliers

We retain the data for 2 years or for as long as we continue to receive a legitimate commercial relationship from the third party supplier. Details are purged every 24 months unless an ongoing transaction is required.

### Members of the public not falling into the categories of 1-4

We do not retain details relating to members of the public whatsoever. Any details captured via our social media channel messaging platforms are deleted once received.

### **Where is personal data held?**

AWeber - our email marketing software  
Gmail – our cloud-based email service  
Shopify – our ecommerce platform  
Paypal - our payment processor  
Authorize.net - our payment processor  
Facebook - social media messaging system  
Xero - our accounting software  
Zendesk - our customer support system

### **How is personal data deleted?**

We hard-delete all records according to the above stated methods except where we are required by law and regulated bodies (such as HMRC) to retain the records for longer.

### **Access to personal information, correction and deletion**

The Directors, staff and consultants of Poppy Austin Limited.