

#### NATIONAL VETERINARY SERVICES LIMITED

# PRIVACY NOTICE FOR EMPLOYEES, WORKERS, DIRECTORS AND CONSULTANTS

This notice applies to our current and former employees, members, workers, directors and consultants. This notice does not form part of any contract of employment or other contract to provide services.

References to we, our or us in this privacy notice are to National Veterinary Services Limited; Registered Number: 8489997; Registered Office: Spitfire House, Unit C250, Iron Place, Stoke on Trent, ST1 5FG, and each of its direct and indirect subsidiaries, trading under the brands "NVS or National Veterinary Services" and "NWL or "Nationwide Laboratories" which make up the NVSL Group.

This privacy notice also covers any joint venture companies, bodies or organisations that we have an interest in and to which you are seconded, carrying out activities on behalf of or are appointed as one of its officers or representatives.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us. This notice explains how we comply with the law on data protection and what your rights are.

For the purposes of this privacy notice the controller is the relevant part of the NVSL Group or our joint venture companies, bodies or organisations which is processing your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Company Secretary has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

#### 1. PERSONAL INFORMATION

When you interact with us in relation to your work with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- contact details such as name, title, addresses, telephone numbers, and email addresses and emergency contact details;
- · date of birth;
- gender and marital status;
- referee details, next of kin, dependents, beneficiaries, details of family members and emergency contacts;
- national insurance number and other tax or governmental identifiers;
- bank accounts, payroll and tax status;
- salary, bonus, commission, profit share, remuneration, pension, insurance, benefits and expenses;

- start date and leaving date;
- location of employment or workplace;
- attendance history, annual leave and other leave;
- driving licence(s) (including copies where we are required to hold such information for identification or insurance purposes where you or other members of your family are to use our vehicles) and vehicle details;
- identification documents and information such as passport, utility bills, identity cards, signature, etc;
- recruitment (including copies of right to work documentation, past employment history, references, psychometric assessments, skills test scores, interview notes and other information included in a CV or cover letter or as part of the application process);
- work records (including job titles, work history, working hours, training records and professional memberships, maternity, paternity, parental, adoption and compassionate leave) and education and professional records/qualifications;
- compensation history and charity donation preferences;
- performance including that generated through our appraisal systems;
- disciplinary and grievance information;
- movements though CCTV footage, driver tracking and other information obtained through electronic means such as swipecard and key fob records;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- attendance at events or functions:
- images in video and/or photographic form and voice recordings;
- shareholding, options, SARS and dividend entitlement; and
- advances of pay that we have made to you.

Depending on the nature of our interactions with you, there may be certain essential personal information that we must collect from you in relation to your relationship with us. This will vary depending on the relationship we have with you.

We may also ask you for additional personal information which it is optional for you to provide but which will allow us to better tailor our relationship with you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your dietary preferences in connection with a social engagement.

We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

#### 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans

We may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below we refer to these as the "special category reasons for processing of your personal data". 3

For criminal records information in relation to you we process it on the basis of Home Office guidelines and our legal obligations or based on your explicit consent. This may include driving convictions where you may drive our vehicles and all relevant criminal convictions where you may be handling drugs as part of our business.

# 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, workers, directors and consultants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or online recruitment platform or work related online platforms such as LinkedIn.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us, from our advisors or from your advisors.

If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your rights in relation to personal information" section below.

# 4. USES MADE OF YOUR PERSONAL INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis		
Non- 'special categories' of Personal Information				
Making a decision about your recruitment or appointment and managing the recruitment process and determining the terms on which you work for us	All the personal information we collect for the purposes of the recruitment process	We need this information to be able to perform and administer the recruitment process for us to engage you This is necessary to enter into a contract with you		
Checking you are legally entitled to work in the UK	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so		
Producing and maintaining business records, staff directories, intranets, websites, brochures and other internal and external business documentation and materials	Personal contact details, location of employment or workplace and employment records	We have a legitimate interest to maintain up to date business records and materials		
Paying you and, if you are an employee, deducting tax and National Insurance contributions	Personal identifiers and transaction and payment information	To be able to manage and perform our contract with you We have a legal obligation to do so		
Providing benefits of employment or working, including flexible benefits and liaising with benefit providers	Personal identifiers, salary, annual leave, pension and benefits entitlement, transaction and payment information	To be able to manage and perform our contract with you We may have a legal obligation to do so.		
Administering the contract we have entered into with you and to manage our relationship with you	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you and manage our relationship with you		
Conducting performance reviews, grievance or disciplinary hearings, managing performance and determining performance requirements and making decisions about compensation and benefits	Performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits	We have a legitimate interest to ensure that our workers are meeting their performance objectives and that the business is managing and controlling the performance process effectively To be able to manage and perform our contract with you		
Business management and planning, including accounting and auditing, conducting our normal business operations	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you. We have a legitimate interest to run and manage our business		
Assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements	Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits and other personal information excluding 'special categories' of personal information and criminal records information	We may be legally obliged to do so To be able to manage and perform our contract with you We have a legitimate interest to run and manage our business and to ensure that our workers are suitably trained		

Making decisions about your continued employment or engagement or termination of our working relationship	Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits	We have a legitimate interest to ensure that the workers we engage continue to be suitably qualified and/or appropriate for their role within the business
Managing absence	Personal identifiers, attendance history and performance	To be able to manage and perform our contract with you We have a legitimate business interest to ensure that the workers we engage continue to be suitably qualified and/or appropriate for their role within the business
Complying with health and safety obligations	Personal identifiers, driver tracking, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, working environment information	We have a legal obligation to comply with Health and Safety laws We also have a legal obligation to report any accidents at work in accordance with health and safety laws
Dealing with legal disputes or queries involving you, or other employees, workers, directors and consultants, including accidents at work.	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you We have a legitimate interest to ensure that all legal claims are managed effectively.
For the purposes of ensuring the security of our premises, property, vehicles, systems and our information, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution and monitor your use of our information and communication systems to ensure compliance with our IT policies	Personal identifiers, CCTV footage, driver tracking and other information obtained through electronic means such as swipecard and key fob records Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information	We have a legitimate business in ensuring our premises and systems are secure To be able to manage and perform our contract with you We have a legitimate interest in ensuring that our workers use our computer systems and information correctly and efficiently and in compliance with our IT policies
To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings	Personal identifiers, transaction and payment information, national insurance number and other tax or governmental identifiers bank account details, payroll and tax status, name, address, date of birth, other directorships	We have a legitimate business in ensuring our premises and systems are secure To be able to manage and perform our contract with you We have a legitimate interest in ensuring that our workers use our computer systems and information correctly and efficiently and in compliance with our IT policies
To conduct data analytics studies to review and better understand worker engagement, retention and attrition rates	Employment and rejection records	We have a legal obligation to do so
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender; marital status; salary, annual	We have a legitimate interest in order to improve as an employer

	leave, pension and benefits; location of employment or workplace	
Storage of records relating to you and also records relating to our business	All non-'special categories' of personal information	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our business is a fair place to work
For the purpose of complying with any legal or regulatory requirements	All the personal information about you excluding special category information and criminal records data	To be able to manage and fulfil our contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records
For the purposes of managing your rights to shares and dividend/profit share details	Shareholdings, options, SARS and dividend entitlement, name address, bank details, payment and transaction information	We may have a legal obligation to comply with certain requirements and we have a legitimate interest in complying with any regulatory requirements
'Special categories' of Personal I	nformation or criminal records	
Storage of records relating to you and also records relating to our business	All 'special categories' of personal information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
		For criminal records information we process it on the basis of legal obligations or based on your explicit consent.
We will use information relating to your absence from work, which may include sickness absence or family-related absences, to comply with employment and other laws	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your physical or mental health to provide you with benefits under your contract	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation or	Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above

political beliefs, to ensure meaningful equal opportunity monitoring and reporting		
For drug and alcohol testing to check compliance against your contract terms and compliance with legal requirements	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work	Information about your criminal convictions and offences	For criminal records information we process it on the basis of Home Office guidelines and legal obligations or based on your e

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage your or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information, you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

#### 5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share personal information with the following parties:

- Companies in the same group of companies as us: for the purpose of manging our business and our relationship with you.
- Any party approved by you.
- Our professional advisors: such as lawyers, accountants, financial advisors, consultants and other advisors.
- Your professional advisors: such as lawyers, accountants, financial advisors, consultants and other advisors
- Customers of our business where necessary: for example if you are visiting the premises or site of a customer they will need your details for access and security.
- Other service providers to our business and advisors: for example payroll, pension administration, benefits provision, banks, professional advisors, contractors, CCTV providers and administration and IT services. All our third-party service

providers and other entities in the group are required to take appropriate security measures to protect your personal information.

- **Purchasers of our business**: buyers or perspective buyers to whom we sell or negotiate to sell our business.
- **Prospective new employers**: for the provision of references for you.
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

Our staff and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section "Who we share your personal information with" above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "Contacting us" section below.

#### 7. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Information is retained in line with our Record Retention Schedule as detailed in Appendix 1, please note that:

• CCTV records are held for no more than 90 days unless we need to preserve the records for the purpose of prevention and detection of crime;

- Information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.
- Information that may be useful to a pension provider or benefit provider which we may retain for the period that your pension or benefit is payable.

It is important to ensure that the personal information we hold about you is accurate and upto-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address; employees are able to update their personal contact/details themselves on Dayforce.

#### 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at https://ico.org.uk/for-the-public/.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email HR@nvs-ltd.co.uk or write to the Data Protection Officer, Lauren Evans (FD), lauren.evans@nvs-ltd.co.uk.

Revision No.	Revision Date	Description of Change(s)	Approval Date	Approved By
1	May 2018	Initial release	May 2018	ELT
2	Sept 2024	Updated DPO details and included retention table in Appendix 1	Sept 2024	DPO, IT Director and HR Director

# **Appendix 1 Record Retention Schedule (United Kingdom)**

Retention period is based on the end of a fiscal year. For example, if 10 years is listed, a file from FY21 could be disposed after FY31.

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
Electronic fund transfer documents	7 years	Best Practices
Employee expense reports, including receipts	8 years	Best Practices
General ledgers	Permanent	Best Practices
Invoices, Customer and AP/Vendor	8 years	Best Practices
Journal entries	7 years	Best Practices
Petty cash vouchers	3 years	Best Practices
Purchase Card/Credit Card statements	6 years	Best Practices
Corporate/Business Records		
Annual corporate filings	Permanent Held at Companies House for 20 years following date of company dissolution	Best Practices
Articles of Incorporation, Bylaws, Corporate Seal	Permanent	Companies Act 2006, Section 809 FCA Listing Rule 3.4.6 R
Board policies, meeting minutes, and resolutions	Permanent	Companies Act 2006, Sections 355 and 358 Companies Act 2006, Section 248 FCA Listing Rule 3.4.6 R
Construction documents	Permanent	Best Practices
Contracts	6 years from expiration	Limitation Act 1980, Sections 5 & 8
Customer records	6 years from end of business relationship	Limitation Act 1980, Sections 5 & 8

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
Fixed asset records	Permanent	Best Practices https://www.gov.uk/ru nning-a- limitedcompany/companyand- accounting-records
General business-related records	6 years	Limitation Act 1980, Sections 5 & 8
Health policy and procedure documentation	6 years	GDPR, Article 5 (1) (e) GDPR, Article 17 (1) (a) GDPR, Article 30 (1) (f) GDPR, Article 89 Data Protection Act 2018
Sales and purchase records, Customer invoices and AP/Vendor invoices	6 years from expiration	Limitation Act 1980, Sections 5 & 8
Sales tax exemption documents	Permanent	Best Practices
Vendor records	6 years from end of business relationship	Limitation Act 1980, Sections 5 & 8
Corporate Tax Records		
Annual tax filings	Permanent	US Treasury Regulations Chapter 4 Section 1.1471 IEIM404080 Miscellaneous: Documentary Evidence: Retention of Documents
		Qualified Intermediary Agreement Section 5.12 Automatic Exchange of Financial Account Information (FATCA and CRS), Commentary on Section IX Chapter 3 and 61, Internal Revenue Code
Audit Reports/Records	Permanent	Best Practices
Business Licenses	Permanent	Best Practices
Charitable contribution records and acknowledgement letters	6 years	Best Practices
M&A Tax Records	Permanent	Best Practices
Other Indirect Tax Records	8 years	Best Practices

Other Tax Documents	10 years	Best Practices
Permanent Tax Records	Permanent	Best Practices
Property Tax Records	Permanent	Best Practices
Provision Files	10 years	Best Practices
Sales and Use Tax Filings	Permanent	Best Practices
Tax Planning Records	10 years	Best Practices
Tax Supporting Records	10 years	Best Practices
<b>Human Resources Records</b> – Pleas claims in each applicable county prior retention periods.		
Annual leave records	6 years from date of termination	Best Practices
Benefits descriptions per employee	6 years from date of termination	Best Practices
Collective bargaining agreements/trade union agreements	6 years from date of termination	GDPR, Article 17(1)(a) GDPR, Article 30 (1)(f) GDPR, Article 89
Death benefit nomination and revocation forms	6 years following payment of benefit	Best Practices
Gender Pay Gap Report	Must keep the information available online for at least 3 years from the date of publication	Government guidance on the gender pay gap report
Employee applications and resumes, and interview records, including for unsuccessful candidates	6 years from date of termination 1 year for unsuccessful applicants Applications should give applicants the opportunity to object to their details being retained	Equality Act 2010, Section 123(2)
Employee background checks	Outcome of background check: 6 years Underlying information used for test: 6 months after notifying candidates of the outcome of the recruitment exercise Criminal records checks and disclosure forms: Purge following recruitment process EXCEPT may be retained if relevant to the ongoing employment	Best Practices

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
	relationship. Purge once the conviction is spent UNLESS employed in an excluded profession	
Employee benefit plans	6 years  Note: for Insurance Policies relating to employee benefits - the retention period will begin upon employment termination	Limitation Act 1980, Sections 5 & 8
Employee offer letters (and other documentation regarding hiring, promotion, demotion, transfer, lay-off, termination or selection for training)	6 years from date of termination	Equality Act 2010, Section 123(2)
Employee records with information on pay rate or weekly compensation	6 years Pay As You Earn records (if applicable) – 3 years following the close of the tax year	Best Practices Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B
Employee tax records	8 years	Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B

Employee training records	6 years	Best Practices Joint Money
	For AML - 5 years	Laundering Steering Group ("JMLSG"), Section 8.24a Money Laundering, Terrorist Financing (information on the Payer) Regulations 2017 ("MLR"), Regulation 24(1)(b)
Employment contracts and employment agreements, including records of changes to terms and conditions of employment	6 years from date of termination	Best Practices
Expense reports	8 years	Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B
Hazardous material exposures	40 years from the date of last entry Records of producers, holders, and consignors– 3 years after the date on which the waste was transferred to another person	Control of Asbestos Regulations 2012, Section 22 Control of Substances Hazardous to Health Regulations 2002, Regulation 11 Management of Health and Safety at Work Regulations 1999 Hazardous Waste (England and Wales) Regulations 2005, Regulation 49

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
Immigration checks	2 years from date of termination	UKVI employer's guide to right to work checks, Section 3 UKVI Tier 2 Sponsor guidance
Injury and Illness Incident Reports	3 years	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 ("RIDDOR"), Section
Job descriptions, performance goals and reviews; garnishment records	6 years from date of termination	Best Practices
Leave records (maternity and parental)	6 years following the close of the tax year in which the last maternity/parental leave pay was issued	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), Regulation 26 Maternity & Parental Leave Regulations 1999
Medical exams required by law	40 years from the date of last entry	Control of Substances Hazardous to Health Regulations 2002 The Management of Health and Safety at Work Regulations 1999
Personnel or employment file	6 years from date of termination	Best Practices
Pre-employment tests and test results	Outcome of pre-employment test: 6 years Underlying information used for test: 6 months after notifying candidates of the outcome of the recruitment exercise	Best Practices
Public contract related personnel or employment records	6 years from date of termination	Best Practices
Salary schedules; ranges for each job description	2 years	Best Practices

Scheme transaction information (including records of monies received/owing to the pension scheme, investments held by the scheme, payments made to the scheme, insurance policies, or any other documents relevant to scheme administration)	6 years from the end of the tax year they relate to (can be retained for much longer period and destroyed when no longer required)	Schemes (Provision of Information)
Scheme governance and management documentation (original copies of scheme governing documentation, terms for appointment of advisors, membership records, records of payments, contribution/payment schedules)	Permanent	Information Commissioner's Office Sample Template
compliance with automatic enrollment legislation (e.g., scheme name, scheme address and reference number, member details, enrolment dates, opt-in and opt-out notices, details of contributions	much longer period and destroyed when no longer required)	Employers' Duties (Registration and Compliance) Regulations 2010, Regulations 5 - 8

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
Statutory Sick Pay (SSP) records, calculations, certificates, self-certificates, occupational health reports.	<ul> <li>6 years from date of termination</li> <li>As a general rule, the company keeps such records for at least 6 months after the end of the period of sick leave in case of a disability discrimination claim</li> <li>In the case of personal injury claims, the company keeps such records for 3 years</li> <li>In the case of any litigation for breach of an employment contract, it may be safer to keep records for 6 years after the employment ceases</li> <li>The company should keep a record of SSP paid due to COVID19 as this can be claimed back from Her Majesty's Revenue and Customs ("HMRC") for 3 years after the end of the tax year. HMRC may request records at any time.</li> </ul>	Best Practices
Time reports	6 years from date of termination	Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B

Workers' compensation records	6 years from date of termination	Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B
Working Time Regulations (WRT) compliance records, including opt-out forms	2 years following the relevant period or opt-out was entered into	Working Time Regulations 1998 (SI 1998/1833), Regulation 9(b)
Information Technology Records		
Backup Records	6 years	Best Practices
Change Management Request	6 years	Best Practices
Logs	6 years	Best Practices
Machine Downtime	6 years	Best Practices
Requests	6 years	Best Practices
Software Licenses	As determined by IT Department	Best Practices
System Documentation	6 years	Best Practices
Web Requests	6 years	Best Practices
Legal and Insurance Records		
Appraisals	Permanent	Best Practices
Copyright restrictions	Permanent	Best Practices
Environmental studies	6 years from end of relevant scheme year  Evidence packs under ESOS assessments: 8 years after end of compliance period to which it relates	CRC Energy Efficiency Scheme Order 2013, Part 5, Regulation 39(1), 39(3) and 40 ("CRC EES Order") The Control of Asbestos Regulations 2012 Control of Vibration at Work Regulations 2005 Management of Health and Safety at Work Regulations 1999 Construction (Design and Management)

		Regulations 2015 Energy Savings Opportunity Scheme
		Regulations 2014 ("ESOS") Regulation 20 Energy Performance of Buildings (England and Wales) Regulations 2012 Hazardous Waste (England and Wales) Regulations 2005
Insurance claims/applications	6 years from the date that th claims file is closed	e Best Practices
Insurance disbursements and denials	In relation to claims, 6 years from the date that the claims file is closed All other disbursements, in accordance with accounting and finance record section	
<ul> <li>Insurance policies</li> <li>Employers Liability (Workers Comp</li> <li>D&amp;O, General Liability and Property</li> <li>Applications</li> </ul>	•	Best Practices
Leases	Permanent	Best Practices
Litigation and claims records relating to matters of \$1 million or more	10 years following closing of matter	Limitation Act 1980, Sections 5 & 8
Litigation and claims records relating to matters in less than \$1 million	As determined by the Legal Department	Best Practices
Patents, patent applications, supporting documents	Permanent	Best Practices
Real estate documents (including loan and mortgage contracts, deeds)	Permanent	Best Practices
Stock and bond records	Permanent	Best Practices https://www.gov.uk/ru nning-a- limitedcompany/company- and-accounting-records
Trademark registrations, evidence of use documents	Permanent	Best Practices
Warranties	6 years from date of expiration	Limitation Act 1980, Sections 5 & 8

**Payroll Records** – Please review the statute of limitations for any payroll-related claims in each legal jurisdiction prior to disposing of records in accordance with the below retention periods.

legal jurisdiction prior to disposing of reco	legal jurisdiction prior to disposing of records in accordance with the below retention periods.		
Payroll registers (gross and net)		Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B	
Payroll tax returns	8 years	Best Practices Finance Act 1998, Paragraphs 21 22, Schedule 18 Taxes Management Act 1970, Section 12B	
Payroll tax withholdings	8 years from date of termination	Best Practices Finance Act 1998, Paragraphs 21, 22, Schedule 18 Taxes Management Act 1970, Section 12B	
Timecards; piece work tickets; wage rate tables; pay rates; work and time schedules; earnings records; records of additions to or deductions from wages; records on which wage computations are based	6 years	Finance Act 1998, Paragraph 21, Schedule 18 Limitation Act 1980, Sections 5 & 8 Income Tax (Pay As You Earn) Regulations 2003 (SI2003/2682), Regulation 97 Taxes Management Act 1970, Section 12B	
Regulatory Records			
Controlled groups (Schedules 2, 3, 4 & 5)	3 years	Home Office – Controlled Drugs & Firearms Licensing Unit	

RECORD TYPES	RETENTION PERIOD	AUTHORITY/REASON
Securities Records		
Documents supporting management's assessment of internal controls over financial reporting	10 years	Companies Act 2006, Section 702 Companies Act 2006, Sections 719 and 720 Best Practices UK Corporate Governance Code (not compulsory)