

## 1. Introduction

This Policy sets out the obligations of Built Environment Communications Group Ltd, a company registered in England under number 03096503, whose registered office is at 8-10 Mansion House Place, London EC4N 8BJ (“BECG”) regarding retention of personal data collected, held, and processed by BECG in accordance with the Data Protection Legislation. “Data Protection Legislation” means all legislation and regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation.

The Data Protection Legislation defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The Data Protection Legislation also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the Data Protection Legislation, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the Data Protection Legislation to protect that data).

In addition, the Data Protection Legislation includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

- a) Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
- b) When the data subject withdraws their consent;
- c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
- d) When the personal data is processed unlawfully (i.e. in breach of the Data Protection Legislation);
- e) When the personal data has to be erased to comply with a legal obligation; or
- f) Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by BECG for the purpose of fulfilling its contracts with clients in respect of marketing, public relations, public affairs and public consultation activity, the period(s) for which those personal data are to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the Data Protection Legislation, please refer to BECG’s Data Protection Policy.

## 2. Aims and Objectives

2.1 The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that BECG complies fully with its obligations and the rights of data subjects under the Data Protection Legislation.

- 2.2 In addition to safeguarding the rights of data subjects under the Data Protection Legislation, by ensuring that excessive numbers of data are not retained by BECG, this Policy also aims to improve the speed and efficiency of managing data.

## 3. Scope

- 3.1 This Policy applies to all personal data held by BECG for the purpose of fulfilling its contracts with clients in respect of marketing, public relations, public affairs and public consultation purposes and in respect of the employment of its staff and by third-party data processors processing personal data on BECG's behalf.
- 3.2 Personal data, as held by BECG is stored in the following ways and in the following locations:
  - a) BECG's servers, located in 8-10 Mansion House Place, London EC4N 8BJ;
  - b) Third-party servers operated by Microsoft and located within the European Economic Area;
  - c) Computers permanently located in BECG's premises at 8-10 Mansion House Place, London EC4N 8BJ; Jellicoe House, Grange Drive SO30 2AF; 55 Colmore Row, Birmingham B3 2AA; Chancery Place, 50 Brown Street, Manchester M2 2JT; 455 Union Street, Aberdeen AB11 6DB; 80 George Street, Edinburgh EH2 3BU and 1 West Regent Street, Glasgow G2 1RW.
  - d) Laptop computers and other mobile devices provided by BECG to its employees;
  - e) Computers and mobile devices owned by employees, agents, and sub-contractors used in accordance with BECG's Bring Your Own Device ("BYOD") Policy;
  - f) Physical records stored in its premises at 8-10 Mansion House Place, London EC4N 8BJ; Jellicoe House, Grange Drive SO30 2AF; 2 Snowhill, Birmingham B4 6GA; Chancery Place, 50 Brown Street, Manchester M2 2JT; 455 Union Street, Aberdeen AB11 6DB; 80 George Street, Edinburgh EH2 3BU and 1 West Regent Street, Glasgow G2 1RW.

## 4. Data Subject Rights and Data Integrity

All personal data held by BECG is held in accordance with the requirements of the Data Protection Legislation and data subjects' rights thereunder, as set out in BECG's Data Protection Policy.

- 4.1 Data subjects are kept fully informed of their rights, of what personal data BECG holds about them, how those personal data are used as set out in Parts 12 and 13 of BECG's Data Protection Policy, and how long BECG will hold those personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).
- 4.2 Data subjects are given control over their personal data held by BECG including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict BECG's use of their personal data, and further rights relating to automated decision-making and profiling, as set out in Parts 14 to 19 of BECG's Data Protection Policy.

## 5. Technical and Organisational Data Security Measures

- 5.1 The following technical measures are in place within BECG to protect the security of personal data. Please refer to Parts 24 to 28 of BECG's Data Protection Policy for further details:
  - a) All emails containing personal data must be encrypted;
  - b) All emails containing personal data must be marked "confidential";

- c) Personal data may only be transmitted over secure networks;
- d) Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself and associated temporary files should be deleted;
- f) Where personal data are to be sent by facsimile transmission the recipient should be informed in advance and should be waiting to receive it;
- g) Where personal data are to be transferred in hardcopy form, it should be passed directly to the recipient, sent using Royal Mail Recorded and a secure courier service;
- h) All personal data transferred physically should be transferred in a suitable container marked "confidential";
- i) No personal data may be shared informally and if access is required to any personal data, such access should be formally requested from the Company Data Protection Representative.
- j) All hardcopies of personal data, along with any electronic copies stored on physical media should be stored securely;
- k) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of BECG or not, without authorisation;
- l) Personal data must be handled with care at all times and should not be left unattended or on view;
- m) Computers used to view personal data must always be locked before being left unattended;
- n) No personal data should be stored on any mobile device, whether such device belongs to BECG or otherwise without the formal written approval of the Company Data Protection Representative and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;
- o) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of BECG where the party in question has agreed to comply fully with BECG's Data Protection Policy and the Data Protection Legislation;
- p) All personal data stored electronically will be stored in the cloud either on BECG's Office365 Tenancy or using secure cloud-based databases. Backups of these services will be made automatically by the service-provider and will be encrypted;
- q) All electronic copies of personal data should be stored securely using passwords and encryption;
- r) All passwords used to protect personal data should be changed regularly and must be secure;
- s) Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- t) All software should be kept up-to-date. Security-related updates should be installed not more than three months;

- u) No software may be installed on any Company-owned computer or device without approval; and
- v) Where personal data held by BECG are used for marketing purposes, it shall be the responsibility of the Head of Group Marketing to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

5.2 The following organisational measures are in place within BECG to protect the security of personal data. Please refer to Part 29 of BECG's Data Protection Policy for further details:

- a) All employees and other parties working on behalf of BECG shall be made fully aware of both their individual responsibilities and BECG's responsibilities under the Data Protection Legislation and under BECG's Data Protection Policy;
- b) Only employees and other parties working on behalf of BECG that need access to, and use of, personal data in order to perform their work shall have access to personal data held by BECG;
- c) All employees and other parties working on behalf of BECG handling personal data will be appropriately trained to do so;
- d) All employees and other parties working on behalf of BECG handling personal data will be appropriately supervised;
- e) All employees and other parties working on behalf of BECG handling personal data should exercise care and caution when discussing any work relating to personal data at all times;
- f) Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- g) The performance of those employees and other parties working on behalf of BECG handling personal data shall be regularly evaluated and reviewed;
- h) All employees and other parties working on behalf of BECG handling personal data will be bound by contract to comply with the Data Protection Legislation and BECG's Data Protection Policy;
- i) All agents, contractors, or other parties working on behalf of BECG handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of BECG arising out of the Data Protection Legislation and BECG's Data Protection Policy;
- j) Where any agent, contractor or other party working on behalf of BECG handling personal data fails in their obligations under the Data Protection Legislation and/or BECG's Data Protection Policy, that party shall indemnify and hold harmless BECG against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

## 6. Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

6.1 Personal data stored electronically (including any and all backups thereof) shall be deleted as follows:

6.1.1 Electronic documents that pertain in its entirety to the subject will be double deleted. The recycle bin deletion is a weekly automated task and double checked by individual staff.

6.1.2 Where electronic documents pertain to and include other subjects then redaction will be used in line with the guidance of the ICO.;

6.2 Special category personal data stored electronically (including any and all backups thereof) shall be deleted securely using the following method:

- a) Data will be deleted from the cloud servers;
- b) Immediately the user will empty the “Deleted Items” folder;
- c) Once deleted, the emails remain on the server hosted by Microsoft for another 30 days. On reaching the 30-day limit the files will be permanently deleted;
- d) During this time all data are fully encrypted using Bit Locker encryption on the hosted Microsoft servers.

6.3 Personal data stored in hardcopy form shall be shredded and recycled;

6.4 Special category personal data stored in hardcopy form shall be shredded and recycled.

## 7. Data Retention

7.1 As stated above, and as required by law, BECG shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which those data are collected, held, and processed.

7.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

7.3 When establishing and/or reviewing retention periods, the following shall be taken into account:

- a) The objectives and requirements of BECG;
- b) The type of personal data in question;
- c) The purpose(s) for which the data in question is collected, held, and processed;
- d) BECG’s legal basis for collecting, holding, and processing that data;
- e) The category or categories of data subject to whom the data relates;
- f) The limitations of law applying to the overall project that BECG has worked on.

7.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of those data, can be regularly reviewed against those criteria.

7.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within BECG to do so (whether in response to a request by a data subject or otherwise).

7.6 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the Data Protection Legislation.

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Name	Name	<p>To enable us to identify a data subject who:</p> <ul style="list-style-type: none"> <li>a) Is participating in a public consultation process.</li> <li>b) Is taking part in market research activities.</li> <li>c) Is participating in a marketing or PR campaign.</li> </ul>	Every 12 months whilst the project is still active.	<ul style="list-style-type: none"> <li>a) 8 years after the project completion.</li> <li>b) 8 years after project completion.</li> <li>c) 8 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>
Address	Postal address	<p>To enable us to contact data subjects to discuss:</p> <ul style="list-style-type: none"> <li>a) The project on which a public consultation is being held.</li> <li>b) Market research activities.</li> <li>c) Various products and services promoted by us on behalf of our clients.</li> </ul>	Every 12 months whilst the project is still active.	<ul style="list-style-type: none"> <li>a) 8 years after the project completion.</li> <li>b) 8 years after project completion.</li> <li>c) 8 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

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Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Telephone	Mobile and landline numbers	<p>To enable us to contact data subjects to discuss:</p> <ul style="list-style-type: none"> <li>a) The project on which a public consultation is being held.</li> <li>b) Market research activities.</li> <li>c) Various products and services promoted by us on behalf of our clients.</li> </ul>	Every 12 months whilst the project is still active.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>
E-mail	E-mail address	<p>To enable us to contact data subjects to discuss:</p> <ul style="list-style-type: none"> <li>a) The project on which a public consultation is being held.</li> <li>b) Market research activities.</li> <li>c) Various products and services promoted by us on behalf of our clients.</li> </ul>	Every 12 months whilst the project is still active.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Gender	Gender	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> </ul>	Only at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>
Sexual Orientation	Sexual Orientation	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> </ul>	Only at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Date of Birth	Date of Birth	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> <li>d) To ensure that we are not collecting data from anyone under the age of 13.</li> </ul>	Never.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> <li>d) No data held on anyone who is under 13.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Age Group	Age Group	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> <li>d) To ensure that we are not collecting data from anyone under the age of 13.</li> </ul>	Every 12 months whilst the project is still active.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> <li>d) No data held on anyone who is under 13.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Ethnicity	Ethnicity	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> </ul>	Never.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Employment	Employment details	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> </ul>	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Shopping Habits	Information on where people shop and what they buy	<p>To enable us to carry out work on behalf of clients to:</p> <ul style="list-style-type: none"> <li>a) Profile areas for potential development opportunities.</li> <li>b) Understand the shopping habits of different demographic groups, so that our clients can refine and develop new products and services and marketing activity.</li> </ul>	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>

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Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Income	Income group	<ul style="list-style-type: none"> <li>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</li> <li>b) To ensure that market research activity is targeted at the correct audiences.</li> <li>c) To enable us to correctly target the promotion of various products and services on behalf of our clients.</li> </ul>	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Feedback	Opinions	<p>a) Opinions of data subjects as part of statutory and non-statutory public consultation exercises, including information on:</p> <ul style="list-style-type: none"> <li>• Views on proposed residential, commercial, retail, transport, energy, waste and general developments</li> <li>• Views on past residential, commercial, retail, transport, energy, waste and general developments</li> <li>• Views on residential, commercial, retail, transport, energy, waste and developments as well as these types of developments in general</li> <li>• Political opinions</li> </ul> <p>b) Opinions about the provision of both existing and proposed public and private sector service.</p> <p>c) Understand the shopping habits of different demographic groups, so that our clients can refine and develop new products and services and marketing activity.</p>	As required by the project or at data subject's request.	<p>a) 12 years after the project completion.</p> <p>b) 12 years after project completion.</p> <p>c) 12 years after project completion.</p>	<p>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</p> <p>b) Data will be archived and not re-used after 3 years.</p> <p>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</p> <p>Where comments and opinions are collected from social media channels (whether public, owned by BECG and its clients), these comments will always be anonymised and never associated with an individual data subject unless the subject specifically consents.</p>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Social Media	Social media names and profiles	To enable us to monitor people's opinions on developments made in public forums.	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>
Politics	Affiliations, memberships, voting intentions	<p>To enable us to analyse feedback in respect of:</p> <ul style="list-style-type: none"> <li>a) Public consultation programmes and activities in the context of people's affiliations, memberships and voting intentions.</li> <li>b) Carry out work on behalf of clients to profile areas for potential development opportunities.</li> </ul>	As required by the project or at data subject's request.	12 years after the project completion.	Data will be archived and not reused once the full project has been completed i.e. once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Socio Demographic	Socio Demographic	<p>To enable us to:</p> <ul style="list-style-type: none"> <li>a) Ensure that public consultation programmes and activities have taken into account the demographic make-up of a particular geography (or group of service-users).</li> <li>b) Carry out work on behalf of clients to profile areas for potential development opportunities.</li> <li>c) Understand the accommodation arrangements of different demographic groups, so that our clients can refine and develop new products and services and marketing activity.</li> </ul>	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after the project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Housing	Information on home ownership. Tenure, type and size of housing	<p>To enable us to:</p> <ul style="list-style-type: none"> <li>a) Ensure that public consultation programmes and activities have taken into account the demographic make-up of a particular geography (or group of service-users).</li> <li>b) Carry out work on behalf of clients to profile areas for potential development opportunities.</li> <li>c) Understand the accommodation arrangements of different demographic groups, so that our clients can refine and develop new products and services and marketing activity.</li> </ul>	As required by the project or at data subject's request.	<ul style="list-style-type: none"> <li>a) 12 years after the project completion.</li> <li>b) 12 years after project completion.</li> <li>c) 12 years after project completion.</li> </ul>	<ul style="list-style-type: none"> <li>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> <li>b) Data will be archived and not re-used after 3 years.</li> <li>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</li> </ul>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Disability	Disability	<p>a) To enable us to ensure that public consultation programmes and activities have taken into account the demographic makeup of a particular geography (or group of service-users).</p> <p>b) To ensure that market research activity is targeted at the correct audiences.</p> <p>c) To enable us to provide services on behalf of clients in healthcare including the following:</p> <ul style="list-style-type: none"> <li>• Medical device and pharmaceutical development</li> <li>• The provision of health services by the public and private sectors</li> <li>• Public consultation activities around the provision of public and private sector healthcare.</li> </ul>	As required by the project or at data subject's request.	<p>a) 12 years after the project completion.</p> <p>b) 12 years after project completion.</p> <p>c) 12 years after project completion.</p>	<p>a) Data will be archived and not re-used once the full project has been completed ie once construction has taken place. Data may be anonymised and used for research purposes at any time up to the deletion period.</p> <p>b) Data will be archived and not re-used after 3 years.</p> <p>c) Data will be archived and not re-used after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.</p>

# Data Retention Policy



Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Medical information	Information about current and past medical history	<p>To enable us to provide services on behalf of clients in healthcare including the following:</p> <ul style="list-style-type: none"><li>• Medical device and pharmaceutical development</li><li>• The provision of health services by the public and private sectors</li><li>• Public consultation activities around the provision of public and private sector healthcare.</li></ul>	As required by the project or at data subject's request.	12 years after project completion.	Data will be archived and not reused after 3 years. Data may be anonymised and used for research purposes at any time up to the deletion period.

## 8. Roles and Responsibilities

- 8.1 BECG's Company Data Protection Representative is Maddie Jones, [dataprotection@becg.com](mailto:dataprotection@becg.com).
- 8.2 The Company Data Protection Representative shall be responsible for overseeing the implementation of this policy and for monitoring compliance with this Policy, BECG's other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with the Data Protection Legislation.
- 8.3 The Company Data Protection Representative shall be directly responsible for ensuring compliance with the above data retention periods throughout BECG.
- 8.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of Data Protection Legislation compliance should be referred to the Company Data Protection Representative.

## 9. Implementation of Policy

This Policy shall be deemed effective as of 1 May 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

**Name:** Carl Daruvalla  
**Position:** Director of Finance and Operations  
**Date:** 1 May 2021  
**Due for Review by:** 30 April 2022

**Signature:**



Data Protection Representative: Maddie Jones, Group Operations Manager

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