



GDPR – Information Retention and Disposal Policy

1. Principles

1.1 Gateway Credit Union (GCU) respects the personal data of members and Colleagues, and is committed to ensuring a robust framework which facilitates appropriate and lawful data controls in accordance with the General Data Protection Regulation (GDPR).

2. Policy Aims

2.1 To ensure that necessary records and documents are adequately protected and maintained.

2.2 To ensure that records are destroyed at the proper time in accordance with all Data Protection legislation.

2.3 To aid Colleagues of GCU in understanding their obligations in retaining and disposing of electronic documents

3. Policy Statement

This Policy represents GCU's policy regarding the retention and disposal of records and the retention and disposal of electronic documents.

3.1 Administration

Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of GCU and the retention and disposal of electronic documents. By delegation of the Board of Directors, the General Manager "Administrator" is the officer in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

3.2 Destruction

Paper documentation no longer required shall be sent for secure destruction. There is no absolute right for an individual to request that their personal information is destroyed -All requests will be referred to the Administrator to decide whether the material should be destroyed and/ or whether there are any exemptions which may apply.

3.3 Suspension of Record Disposal In Event of Legal Claim or suspected money laundering

In the event GCU is served with any writ or request for documents or any colleague becomes aware of a governmental investigation or audit concerning GCU or the commencement of any legal claim concerning GCU, such colleague shall inform the Administrator and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of a legal advisor, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all colleagues of any suspension in the further disposal of documents. Suspension of record disposal may also be requested by the Money Laundering Reporting Officer.

3.4 Applicability

This Policy applies to all physical records generated in the course of GCU's operation, including both original documents and reproductions. It also applies to the electronic documents described above. Unless otherwise stated documents will be reviewed for destruction as part of the year end procedure.

4. Applicable Legislation

4.1 The Data Protection Act 1998, superseded by the GDPR (2018) applies to this policy.

5. Regulatory Controls & CREDS

5.1 Regulations relating to lending can be found in CREDS 7: 'Lending to Members'

5.2 GCU is registered with the Information Commissioner's Office (ICO).

6. Rulebook Requirements

6.1 The following Rules contained in the Rules of Gateway Credit Union are applicable to this policy:

Rules 137-138: Confidentiality

Any Director or Colleague of the Credit Union shall not disclose to any person any information regarding any transaction of a Member of the Credit Union except in so far as may be necessary for the proper conduct of the business of the Credit Union, and in keeping with the Statements of Principle and Code of Practice for Approved Persons. On appointment, all Directors and Colleagues of the Credit Union shall sign a confidentiality agreement to ensure the confidentiality of all business conducted by the Credit Union.

The Credit Union shall comply with the Data Protection Act 1998 concerning the protection of data.

Regulations relating to appropriate controls and processes can be found in CREDS 2: 'Senior Management, Arrangements, Systems and Controls

As a 'data controller' GCU is required under the Data Protection Act 1998 to register with the Information Commissioners' Office.

7. Decision Making & Delegated Responsibilities

7.1 The General Manager and the Board of Directors appointed for legal oversight will manage any routine matters arising from this policy.

7.2 The General Manager will be responsible for overseeing the deletion of member data in accordance with this policy.

7.3 The General Manager will be responsible for overseeing the deletion of finance, colleague and grant-related documents in accordance with this policy.

8. Related Policies

This policy applies to all GCU policies as applicable, but is particularly applicable to:

Credit Control
Data Protection and Confidentiality
Equality and Diversity
Lending
Membership
Membership Complaints
Member Services
Document Security
Vulnerable Customers
Whistleblowing
Performance Management

9.1 No Performance Management Indicators (PMI) are applicable in this instance.