

RETENTION POLICY This policy will be amended prior to the introduction of GDPR in May 2018

RETENTION SCHEDULE

SPECIFIC RECORDS

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|---|--|--------|--|------------------------|
| Books of Accounts | Varies, but generally 6 years. | | Generally, date of creation of record. | Often held for 7 years |
| Payroll and salary records | Minimum 6 years or such shorter period as the Revenue Commissioners may authorise in writing | | From the end of the year to which such records refer | Often held for 7 years |
| Working time records | 6 years | | From the date of the leave | Often held for 4 years |
| Parental leave/force majeure records | 8 years | | From the date of the leave | Often held for 9 years |
| Employee tax records | 7 years | | Termination of employment | Often held for 8 years |
| Employment contract | Duration of employment relationship + 6 years | | Date of termination | Often held for 7 years |
| Record of ID documents of employees. Do not keep copies of passports or driving licences. If required, the last four digits of such documents can be recorded, once the Hotel has seen the original and satisfied themselves as to the ID of the employee | Duration of employment Relationship + 1 year | | Date of termination | Often held for 4years |
| Data documents concerning pension schemes | Permanently | | | |

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|---|--|--------|------------------------------------|-------------------------|
| Data of rejected job applicants. | 1 year | | From date of interview/application | Often held for 2 years. |
| Reports on employee performance review meetings and assessment interviews (e.g. evaluations, employment application forms of successful applicants, copies of academic and other training received, employment contracts and their amendments, correspondence concerning appointment, appraisals, promotions and demotions, agreements concerning activities in relation to the works council, references and sick leave records) | 6 years | | From date of creation | |
| List of employees who have worked under dangerous conditions or whose health has otherwise been under threat | Varies: for as long as issue remains. If no issue, hold for no longer than 1 year after employment ends, unless litigation apprehended or threatened | | From cessation of issue | |
| Accident reports | 10 years. | | From the date of the accident | |
| General ledger, accounts receivable department, accounts payable department, (procurement and) sales administration, inventory Records | 6 years | | | |
| Contract – records relevant to the defence of any proceedings in | As the proceedings must be issued within 6 years, and | | Last action taken under contract | |

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|----------------------|--|--|---------------------------|--|
| contract | service may not follow for up to 1 further year, retention for seven years suggested or 13 years where contracts are executed under seal | | | |
| CCTV | 3 month | | From date of capture | |
| Local Drives: | | Local drives should not have personal data kept on them. It is bad governance. If personal data is stored on them, then they should be archived/deleted in the same way as server side information. | | Items in local drives should not be archived. Local drives should only be used for local programs and apps. |
| Emails | 3 years | | | Archive after six months. |

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|---|---|--------|---|--------------------------------------|
| Subject Access Requests | 6 years | | Access request | To show access request has been met. |
| HR data other than leave or Pension Documents | Until no longer operationally necessary/until termination of employment | | 1-year post archiving/post termination, whichever is the earlier. | |
| HR data on pension or leave | Until no longer operationally necessary/until termination of employment | | 6 years post termination | |
| Details of unsuccessful candidates | 1 year. | | Archive once outcome of candidature is known | |

HOTEL SPECIFIC RECORDS

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|--|---|---------------|--|---|
| Electronic marketing data – non-customers | 3 year | | Creation | |
| Electronic marketing data – customers | 3 year | | From last point of contact with customer | Customers do not need to consent to receive marketing data |
| Booking data, check-in data, special requests data | For as long as the guest remains a customer | | | A customer relationship is generally considered terminated from a data protection viewpoint if a transaction has not occurred within the previous year. |
| Financial data and credit card information | For as long as it is necessary to process the transaction, including any queries which may arise. | | | |
| Loyalty scheme information | For as long as the guest is an active participant in the loyalty scheme. . | | | Non—use of the scheme for a year or more, would indicate cessation |
| Health data special requests, or in connection with gyms or spas | Typically one year from the last transaction. | | | |
| Contact information of guest. | As long as the guest remains a customer. | | Typically one year from the last transaction | |

| Record Type Category | Retention Period | Reason | Start of Retention Period | Notes |
|---|----------------------------------|--------|---------------------------|-------|
| Information provided via tour operators and other 3 rd parties. (guest lists etc). | One year from the date of visit. | | | |
| Details of current registration number, details of driving licence, details of passport | One year from the date of visit. | | | |
| Hotel register data. | 3 years | | | |
| | | | | |