

## 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 4 years
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	

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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 <sup>rd</sup> 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			