



The Pure Group*

External Data Retention Policy

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* Statkraft Pure Energy Ltd and its subsidiaries, together "the Pure Group"

Bryt Energy



This external policy defines the procedure and responsibilities for the Group Data Retention process.

CONTENTS

1 PURPOSE AND SCOPE	3
2 HOW LONG WILL WE STORE CUSTOMER DATA FOR?	3
3 HOW LONG WILL WE STORE HUMAN RESOURCE (HR) DATA FOR?	4
4 RIGHT TO DELETION.....	5
5 STAFF AWARENESS AND TRAINING	5
6 IDENTIFYING AND REPORTING BREACHES	6
7 DEPLOYMENT	6
8 COMPLIANCE	6
9 APPROVERS	6

Accountable: Duncan Forsyth – Finance Director

Responsible: All Group employees

1 PURPOSE AND SCOPE

This policy will ensure that the necessary procedures and controls are in place to ensure that all staff are aware of and adhere to the Data Retention policy guidelines. This policy should be used in conjunction with the Group Data Protection policies.

The External Data Retention policy covers personal data processing related to customer data, third-party data, and any other external business partner whom we may process personal data about.

Correct handling of personal data is necessary to ensure compliance with Data Protection laws and to safeguard the Group's reputation as somewhere personal data protection is given high priority.

Each department manager is responsible for ensuring their staff has received full training of the Data Protection and Data Retention policies and that the employees adhere to the procedures indicated within the documents. All employees are responsible for ensuring they continually comply with the Data Protection and Retention guidelines. It is a collective task shared across all businesses in the Group. The board of directors has overall responsibility for ensuring that all personal information is handled in compliance with the law and has appointed a Data Protection Manager to carry out day-to-day responsibility for data processing and data security. Quality checks will be completed on the various business activities to ensure compliance is being met.

Any breach of this policy will be taken seriously and may result in disciplinary action. Revisions to the Data Retention Policy will be made subject to approval from the Data Protection Manager.

2 HOW LONG WILL WE STORE CUSTOMER/TPI DATA FOR?

Customer data retention controls relate to data that is held for prospective customers of Pure and those who are supplied or have been supplied by Pure. Customer data includes personal data held about individuals (such as company directors, MPANS, site addresses, HH data and contacts on accounts) including sole traders and partnerships. TPI data relates to personal data Pure processes against TPI representatives. For more information on the specific data Pure processes, please reference the [Bryt Energy Privacy Policy](#).

All data will be gathered and stored only for the specific and legitimate purpose of processing the data. Data includes, but is not limited to, information such as contact details, call recordings, survey responses, email correspondence, and usage of the Pure website.

Customer and TPI data can be held in the following locations:

System	Access Controls	Retention Period
Pure's CRM systems	Data is only accessible by authorised users	Customer/TPI data will be retained for six years following the end of the contractual relationship with the customer or TPI

Emails	Data is only accessible by the email recipients, mailbox owner/s and IT	Where the data is stored within a Pure employee's mailbox, we retain that data for the duration of the contract plus 3 months following the end of employment. Alternatively, if the customer/TPI data is stored in a centralised mailbox and/or in our system, we retain that data for six years following the end of the contractual relationship with the customer or TPI
Paper records which are stored in locked cupboards	Data is only accessible by authorised users	Customer/TPI data will be retained for six years following the end of the contractual relationship with the customer or TPI
Calling recording system	Data is only accessible by authorised users	Data is stored for 12 months, at which time the call will be automatically deleted.
Other systems such as financial or marketing platforms, which are used by Pure to legitimately process the data which is required to provide products and services to the customer	Data is only accessible by authorised users	Customer/TPI data will be retained for six years following the end of the contractual relationship with the customer or TPI

Customers and TPIs will be notified of how long their data will be stored in accordance with the information held on the Pure website and the Pure Terms & Conditions which are issued as part of the supply contract or TPI agreement. Personal data that is no longer required will be deleted or anonymized in accordance with the following guidelines.

There may be circumstances when we need to keep a customer's personal data for longer, for instance, if they are on a long-term payment plan or to meet our legal obligations, but we will delete the information once it is no longer required.

The Managing Director has the responsibility for ensuring that all customer related documents are stored, retained and deleted in accordance with the mandated guidelines. All employees have the responsibility to ensure they follow the guidelines within this document.

3 HOW LONG WILL WE STORE HUMAN RESOURCE (HR) DATA FOR?

HR data retention controls relate to data that is held for prospective employees who submit an interest in working with Pure, contracted employees, contractors and temporary employees.

All data will be gathered and stored only for the specific and legitimate purpose of processing the data. Prospective employees will be notified of how long their data will be stored in the automatic email they receive when they contact careers@brytenergy.co.uk. Personal data that is no longer necessary to be stored will be deleted or anonymized.

All HR related data is stored in restricted areas within the company's system and can only be accessed by specific authorized users from senior management, HR and finance teams. Where required, paper documents will be held within locked cupboards with access restricted to specified employees. The HR department has responsibility for ensuring that all HR-related documents are stored, retained, and deleted in accordance with the mandated guidelines.

Type of employment record	Retention Period	Reason for retention period
Recruitment		
CVs/Application forms, interview notes, written references from previous employers and copies of qualification certificates for successful candidates	12 months from the date of appointment	Sufficient time for purposes of verification re-appointment of successful candidates and takes account of the limitation period for potential discrimination claims from unsuccessful candidates - three months (plus margin for Early Conciliation or possible extension of time limit)
CVs/Application forms of unsuccessful candidates, kept to inform candidates of future vacancies	12 months from date CV/application submitted	Sufficient time as the CV will likely be out of date after 12 months when candidates have gained greater experience, new skills.
Copies of qualifications (where qualification required for performance of the role)	12 months for unsuccessful applicants. Or, for the duration of the employment contract plus 6 months after the contract end date for successful candidates	Sufficient time to retain data whilst certificates are valid and required for the role. For unsuccessful candidates whom we'd like to keep informed of future roles, we follow the same retention period as CVs (above).

4 RIGHT TO DELETION

This is also known as the "right to be forgotten" and "right to erasure". A customer has the right to ask us to erase the personal information we currently hold about them. Where the request is valid, Pure will take reasonable steps to ensure the removal of such personal data. Pure may wholly or partly refuse any request that is deemed to be manifestly unfounded or excessive, and where there are legitimate reasons to continue holding the data. Every request is assessed case by case and any decisions the group makes will be communicated to the requester within 1 month, this may be extended by a further 90 days if the request is more complex.

All requests can be made verbally or in writing. We encourage requests to be made directly to our Data Protection Manager (dpm@brytenenergy.co.uk).

For additional guidance on Right to Erasure Requests, please visit the ICO website for more information.

5 STAFF AWARENESS AND TRAINING

All Group employees will receive Data Protection awareness training when they join the company. This will be refreshed annually for all staff, or earlier should any significant policy changes come into effect which are important to be briefed to all employees to ensure compliance is met.

Included within the training will be an overview of the group Data Retention policy to ensure all staff are aware of the expectations of them to maintain a compliant operation.

6 IDENTIFYING AND REPORTING BREACHES

Pure has a formal process when dealing with data breaches, which all employees are made aware of when they join us. If there is a suspected incident involving personal data or there has been a breach of the guidelines indicated within this document, then in the first instance the Data Protection Manager should be notified (dpm@brytenenergy.co.uk). They will review and assess the suspected breach and will provide guidance on how to resolve the issue.

All Pure's employees have an obligation under the Data Protection Act to ensure breaches are notified to the relevant party without undue delay. We annually review and retrain all employees to ensure the guidance in this policy is being met.

7 DEPLOYMENT

The External Data Retention policy was communicated to all staff in September 2023.

Each of our department managers are responsible for ensuring their staff have received full training within the Data Protection guidelines, and that they adhere to the procedures indicated within this document.

8 COMPLIANCE

Adherence to this policy will be monitored through internal auditing and reporting.

Internal staff audits and annual internal data protection audits will also be completed to ensure adherence to the policy.

Where appropriate, Pure will audit its third-party processors to ensure adherence to the policy.

9 APPROVERS

Approvers	Role	Date
Duncan Forsyth	Finance Director (DPM)	07/09/2023
Heidi Wilbor	Operations & HR Director	08/09/2023