

Data Retention Policy for Adam Smith Magician

Organisation: Adam Smith Magician

Effective Date: 09/06/2026

Review Date: 09/06/2027

1. Purpose

This Data Retention Policy explains how Adam Smith Magician manages the retention, storage, and disposal of personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable legal requirements.

The organisation is committed to ensuring that personal data is retained only for as long as necessary and securely disposed of when no longer required.

2. Scope

This policy applies to:

- **All personal data processed by the organisation**
- **Electronic records**
- **Paper records**
- **Email correspondence**
- **Website submissions**
- **Customer and supplier information**
- **Employee and volunteer records (where applicable)**

3. Data Protection Principles

We will ensure that personal data is:

- **Processed lawfully, fairly, and transparently**
- **Collected for specified and legitimate purposes**
- **Limited to what is necessary**
- **Accurate and up to date**
- **Retained only for as long as necessary**
- **Protected through appropriate security measures**
- **Securely deleted when no longer required**

4. Retention Schedule

The following retention periods apply unless legal, regulatory, contractual, or operational requirements require a longer retention period.

Record Type	Retention Period
Website contact form enquiries	12 months
General customer enquiries	12 months
Customer correspondence	6 years
Contracts and agreements	6 years after termination
Financial and accounting records	6 years
Marketing consent records	Duration of consent plus 2 years
Newsletter subscriber records	Until unsubscribed plus 12 months
Data Subject Access Requests (DSARs)	3 years after closure
Data protection complaints	3 years after closure
Website analytics data	Up to 26 months
Security logs	12 months
CCTV recordings (if applicable)	30 days unless required for investigation
Incident and breach records	6 years
Employee records (if applicable)	6 years after employment ends

5. Website Data

Personal information collected through the website may include:

- **Names**
- **Email addresses**
- **Telephone numbers**
- **IP addresses**
- **Contact form submissions**
- **Cookie preferences**
- **Website analytics data**

Such information will only be retained for as long as necessary to fulfil the purpose for which it was collected.

6. Data Subject Access Requests (DSARs)

Records relating to DSARs will be retained for three years following completion of the request to demonstrate compliance with legal obligations.

7. Data Protection Complaints

Records relating to complaints about privacy or data protection matters will be retained for three years after the complaint has been resolved unless a longer retention period is required.

8. Secure Disposal

When retention periods expire, personal data will be securely deleted, destroyed, or anonymised.

Methods may include:

Electronic Records

- **Secure deletion from systems and databases**
- **Removal from active storage**
- **Deletion from backups where appropriate**

Paper Records

- **Cross-cut shredding**
- **Confidential waste disposal services**

Portable Devices

- **Secure wiping of storage media**
- **Physical destruction where necessary**

9. Legal Holds

Where litigation, investigations, regulatory requests, or legal obligations require information to be preserved, normal retention periods may be suspended until the matter has concluded.

10. Responsibilities

Management

Management is responsible for:

- **Ensuring compliance with this policy**
- **Providing adequate resources**
- **Monitoring retention practices**

Staff and Representatives

Individuals handling personal data must:

- **Follow retention schedules**
- **Protect information from unauthorised access**
- **Dispose of information securely**
- **Report concerns regarding data retention**

11. Policy Review

This policy will be reviewed annually or sooner if:

- **Legislation changes**
- **Regulatory guidance changes**
- **Organisational practices change**
- **Significant data protection risks are identified**

12. Contact Information

Questions regarding this policy may be directed to:

Data Protection Officer / Privacy Contact

Name: Jax Smith

Email: info@adams-magic.co.uk

Telephone: 07469 241 313