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Hupsoo Ltd

Data Retention Policy

Document Owner: Hupsoo Ltd

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1. Purpose

Hupsoo Ltd is committed to protecting the personal data of candidates, clients, temporary workers, contractors, suppliers and employees in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and all other applicable legislation.

This Data Retention Policy explains how long Hupsoo Ltd retains personal data, the reasons for retention and how data is securely deleted or destroyed when no longer required.

2. Scope

This policy applies to all personal data processed by Hupsoo Ltd in connection with recruitment and employment related activities, including data held electronically, in paper format, within software systems, email accounts, cloud storage and archived records.

This policy applies to:

- Permanent recruitment activities
- Temporary and contract recruitment activities
- Payroll and compliance administration
- Client and supplier management
- Internal employee records
- Marketing and business development activities

3. Principles

Hupsoo Ltd will ensure that personal data is:

- Retained only for as long as necessary
- Kept accurate and up to date
- Stored securely and confidentially
- Deleted or destroyed securely when no longer required
- Reviewed regularly to ensure compliance

Retention periods are determined based on:

- Legal and regulatory requirements
- Recruitment industry best practice
- Business and operational requirements
- Contractual obligations
- Limitation periods for legal claims

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4. Retention Periods

Candidate Records

Unsuccessful Candidates

Including CVs, interview notes, application forms and correspondence.

Retention Period:

12 months from last meaningful contact.

Reason:

To consider candidates for future opportunities and manage potential legal claims.

Successful Candidates Placed Permanently

Retention Period:

6 years from placement date.

Reason:

Contractual, legal and financial record keeping purposes.

Temporary Workers and Contractors

Including right to work documents, timesheets, payroll information and compliance records.

Retention Period:

6 years after end of assignment.

Reason:

Employment law, HMRC and contractual obligations.

Right to Work Documentation

Including passports, visas and share code checks.

Retention Period:

Duration of employment or assignment plus 2 years.

Reason:

Compliance with UK immigration legislation.

Payroll Records

Including payslips, pension records, deductions and payment history.

Retention Period:

6 years from the end of the financial year to which they relate.

Reason:

HMRC and statutory compliance requirements.

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Client Records

Including contracts, terms of business, correspondence and invoices.

Retention Period:

6 years after business relationship ends.

Reason:

Contractual and financial compliance purposes.

Supplier Records

Including invoices, contracts and payment details.

Retention Period:

6 years after relationship ends.

Reason:

Accounting and tax compliance obligations.

Employee Records

Personnel Files

Including contracts, performance records and disciplinary documentation.

Retention Period:

6 years after employment ends.

Accident Records

Retention Period:

Minimum of 3 years from date of incident.

Where the incident involves a minor, records may be retained longer in line with limitation periods.

Pension Records

Retention Period:

6 years minimum, or longer where legally required.

Marketing Data

Including mailing lists and marketing preferences.

Retention Period:

Until consent is withdrawn or the individual becomes inactive for 24 months.

CCTV Footage (if applicable)

Retention Period:

30 days unless required for investigation purposes.

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5. Lawful Basis for Retention

Hupsoo Ltd retains personal data under one or more lawful bases including:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests

Where consent is relied upon, individuals may withdraw consent at any time.

6. Secure Storage

Hupsoo Ltd implements appropriate technical and organisational measures to protect personal data, including:

- Password protected systems
- Secure recruitment software
- Restricted access controls
- Antivirus and cybersecurity protections
- Locked storage for paper records
- Secure disposal methods

7. Secure Deletion and Disposal

When data reaches the end of its retention period, it will be securely deleted, destroyed or anonymised.

Methods may include:

- Permanent deletion from digital systems
- Secure shredding of paper documents
- Confidential waste disposal services
- Secure destruction of storage devices where necessary

8. Data Subject Rights

Individuals have rights under UK GDPR including the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure where applicable
- Restrict processing
- Object to processing
- Request data portability

Requests should be submitted to:

Email: letsgo@hupsoo.co.uk

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9. Responsibilities

The Directors of Hupsoo Ltd are responsible for ensuring compliance with this policy.

All employees handling personal data must:

- Follow this policy
- Maintain confidentiality
- Report data breaches immediately
- Ensure records are accurate and secure

10. Policy Review

This policy will be reviewed annually or sooner where required due to legislative or operational changes.

11. Contact Information

For any questions relating to this policy or data protection matters, please contact:

Hupsoo Ltd

Email: letsgo@hupsoo.co.uk

Telephone: 01621 735448