



The untold stories of
Relatives, Victims, and Survivors



Head Office
39 Glen Road
Belfast
BT11 8BB

T: +44 (28) 90 627171
E: info@relativesforjustice.com
www.relativesforjustice.com

North Belfast Office
2-4 Brompton Park
Belfast
BT14 7LD

T: +44 (28) 96 949327
E: ardoyne@relativesforjustice.com
www.relativesforjustice.com

Mid-Ulster Office
42/44 Irish Street
Dungannon
BT70 1DQ

Tel: +44 (28) 8775 1697
E: dungannon@relativesforjustice.com
Twitter @RelsForJustice

DATA RETENTION POLICY

Relatives for Justice seeks to ensure that it retains only data necessary to effectively conduct its program activities and work in fulfilment of its mission.

The need to retain data varies widely with the type of data and the purpose for which it was collected. RFJ strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required. This policy sets forth RFJ's guidelines on data retention and is to be consistently applied throughout the organization.

Scope

This policy covers all data collected by RFJ and stored on RFJ owned or leased systems and media, regardless of location. It applies to both data collected and held electronically (including photographs, video and audio recordings) and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by federal or local law, federal regulations and legitimate business purposes, as well as the EU General Data Protection Regulation (GDPR).

Reasons for Data Retention

RFJ retains only that data that is necessary to effectively conduct its program activities, fulfill its mission and comply with applicable laws and regulations.

Reasons for data retention include:

- Providing an ongoing service to the data subject (e.g. sending a newsletter, publication or ongoing program updates to an individual, ongoing training or participation in RFJ's programs, processing of employee payroll and other benefits)
- Compliance with applicable laws and regulations associated with financial and programmatic reporting by RFJ to its funding agencies and other donors
- Compliance with applicable employment, tax and immigration laws
- Other regulatory requirements

Relatives for Justice is recognised by the Inland Revenue as a Registered Charity NIC101311; And a Company Limited by Guarantee NI44611



- Security incident or other investigation
- Intellectual property preservation
- Litigation

Data Duplication

RFJ seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other business reasons it is necessary for data to be held in more than one place. This policy applies to all data in RFJ's possession, including duplicate copies of data.

Retention Requirements

- RFJ has set the following guidelines for retaining all personal data as defined in the organisation's data privacy policy. RFJ service user data will be retained as long as necessary.
- Program participant data (including sign in sheets) will be retained for the duration of the grant agreement that financed the program plus any additional time required under the terms of the grant agreement.
- Personal data of subgrantees, subcontractors and vendors will be kept for the duration of the contract or agreement plus any additional time required by any grant agreement.
- Employee data will be held for the duration of employment and then 7 years after the last day of employment.
- Data associated with employee wages, leave and pension shall be held for the period of employment plus 7 years with the exception of pension eligibility and retirement beneficiary data which shall be kept for 15 years.
- Recruitment data, including interview notes of unsuccessful applicants, will be held for 7 years after the closing of the position recruitment process plus any additional time required by grant agreements.
- Consultant (both paid and pro bono) data will be held for the duration of the consulting contract plus any additional time required by grant agreements after the end of the consultancy.
- Board member data will be held for the duration of service on the Board plus for 7 years after the end of the member's term.
- Data associated with tax payments (including payroll, corporate and VAT) will be held for the period of employment plus 7 years.
- Operational data related to program proposals, reporting and program management will be held for the period required by the Relatives for Justice, but not more than necessary.

Data Destruction

Data destruction ensures that RFJ manages the data it controls and processes it in an efficient and responsible manner. When the retention period for the data as outlined above expires, RFJ will actively destroy the data covered by this policy. If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, he or she should identify this data to his/her supervisor and provide information as to why the data should not be destroyed. Any exceptions to this data retention policy must be approved by RFJ's data protection officer in consultation with legal counsel. In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain

documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.

