



## Middle Marches Community Land Trust

### Data Retention Policy

#### 1. Introduction

This Data Retention Policy (the “Policy”) sets out the principles for retaining, reviewing and deleting data. The policy is required to support the proper storage and preservation of MMCLT’s essential records, to enable identification and destruction of information where there is no continuing business or legal significance, and to help us to comply with the requirements of relevant legislation.

#### 2. Data protection

- This policy ensures that MMCLT complies with GDPR Principle 5 by retaining personal data only for as long as necessary for its original purpose. This means we must:
  - Review the length of time for which we keep personal data.
  - Consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it.
  - Securely delete information that is no longer needed for this purpose or these purposes.
  - Update, archive or securely delete information if it goes out of date.

#### 3. Reviewing the data held by MMCLT

In line with best practice recommended by the ICO, the Data Protection Lead will undertake a full review of all personal data held by MMCLT every 2 years. This will include:

- Reviewing the purposes for which we hold personal data against the original purposes for which it was obtained - if these do not align or the information is no longer needed or it is out of date, it will be archived or securely deleted (depending on whether there are any legal requirements to retain the information).
- Where necessary, we will inform any third parties we share the information with of the data being deleted.

#### 4. Information that needs to be kept by law

MMCLT must keep personal data only for as long as needed. However, storing data to meet statutory or professional requirements (e.g. audit purposes) is a valid reason to retain it, provided it is not held beyond the required period.

Files that must be retained by law applicable to MMCLT are listed in the table below:

File (electronic and paper copies)	Retention period	Sensitive personal data	Additional information
Gift Aid declaration	6 years from the end of the accounting period they relate to. Enduring declarations are kept permanently.	No	<a href="https://www.gov.uk/guidance/gift-aid-declarations-claiming-tax-back-on-donations">https://www.gov.uk/guidance/gift-aid-declarations-claiming-tax-back-on-donations</a>
Accounting records	6 years from creation (Companies Act 1985)	No	<a href="https://www.legislation.gov.uk/ukpga/2006/46/part/15/Chapter/2">https://www.legislation.gov.uk/ukpga/2006/46/part/15/Chapter/2</a>

At the end of the retention period, these files should be reviewed and deleted, unless there is some special reason for keeping them, which must be documented by the Data Protection Lead during the biennial review. If the data continues to be held, subject access to it must be granted if requested, and MMCLT must comply with the [Data Protection Principles](#).

This policy will be reviewed every two years or sooner if there are significant changes in legislation or MMCLT activities.

Note also the related MMCLT Privacy Policy.