

## **Data Retention Policy**

Grampian credit union will comply with regulatory and industrial standards in retaining information on its members, employees and volunteers including:

1. Permanently retaining records pertaining to:
  - Register of Members
  - Rules and Amendments (as registered with the Financial Conduct Authority)
  - Receipts for any securities held, securities register and register of contracts of guarantee.
  - Minutes of annual and special general meetings and the meetings of the Board of Directors.
  - Members' Share and Loan Register
  - Copies of Annual Returns
  - Register of bad debts written off
  - Health & Safety Consultations
2. Retaining for 40 years:
  - Employer's Liability Certificate
3. Retaining for 6 years:
  - All record appertaining to the accounts of the credit union including:
    1. Receipts and invoices.
    2. Ledgers and cash books (whether manual or electronic)
    3. Payroll Information
    4. VAT books and copies of returns
    5. Corporation tax records
  - Disciplinary, working time and training, redundancy details (after employment ceases)
  - Employee details and records
  - Financial Promotions
  - Senior Management Arrangements Systems and Controls
  - Information pertinent to Regulatory References
4. Retaining for 5 years:
  - Evidence of identity, member transactions, reports of suspicious transactions (internal and external)
  - Training records for anti-money laundering regulations
  - Loan Applications (after loan has been repaid)
  - Investment decisions, including making a subordinated loan to another credit union
5. Retaining for 3 years:
  - Accident Reports
  - Complaints (once resolved)
6. Retaining for one year:
  - Application forms/interview notes for unsuccessful candidates