|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **Retention Analysis** |  |  |  |  |  |  |
| **Category of Data subject** | **Retention method: hard copy, database, email?** | **Type of personal data retained e.g. CV, online record, banking details** | **Most probable lawful processing ground** | **Last contact from data subject** | **Last contact from us** | **Purpose for retaining?** | **Review Period- stripping back data** | **Deletion Backstop Date** |
| Current Employee |  |  |  |  |  |  |  |  |
| Ex- employee |  |  |  |  |  |  |  |  |
| Non employee – direct hire |  |  |  |  |  |  |  |  |
| Suppliers |  |  |  |  |  |  |  |  |
| **Permanent/ Fixed Term**  **Candidates** |  |  |  |  |  |  |  |  |
| Placed in last 6 years | *CRM, accounting system, employee business emails* | *CV, introduction records, communication arranging placement, passport copy* | *Assumed consent* | *Prior to placement* | *Set to no marketing* | *Legal requirement – record of business completed* | *Review 6 years after placement* | *To be kept under review* |
| Not placed but interviewed in last 6 years |  |  |  |  |  |  |  |  |
| Neither – registered in last 2 years |  |  |  |  |  |  |  |  |
| Placed more than 6 years ago |  |  |  |  |  |  |  |  |
| Interviewed more than 6 years ago |  |  |  |  |  |  |  |  |
| Neither – registered more than 2 years ago |  |  |  |  |  |  |  |  |
| **Temporary Contractors** |  |  |  |  |  |  |  |  |
| **Client Contacts** |  |  |  |  |  |  |  |  |
| Placement in last 6 years |  |  |  |  |  |  |  |  |
| Interview in last 6 years |  |  |  |  |  |  |  |  |
| Neither in last x years |  |  |  |  |  |  |  |  |
| Other data subjects e.g. suppliers |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

This is for guidance only and is not legal advice. It is a suggested starting point for analysing the data you have and assessing the your business interests in retaining the data and determining how you will continue to review your retention and the maximum period you reasonably need to retain the data for.