Name of Controller: Karen Finch, Managing Director of The Hearing Care Centre Ltd
Address: 11 Upper Brook Street, IPSWICH, Suffolk, IP4 1EG
Telephone: 01473 230330

Data Retention Policy

Type of record	Time limits set for erasure	Schedule	Action Owner	Action Date
Patient Records – including test results/lifestyle information/referral letters/imaging,	*Keep health records for as long as necessary. This will vary depending on specific relationship with HCC. For example existing client HCC will keep all records to ensure it continues to meet its duty of care, but if the client has not seen a member of the team for 8 years HCC will consider securely destroying the records on a case by case basis.*	*Continual cleansing NOAH, ACT and marketing databases:* *ACT: Contact details, medical records and financial records (not card details): Customer data removed from live database monthly and archived. It is then kept for 8 years before being destroyed.*	*Operations/Marketing Manager(MC)*	*Archiving: 1st of each month (completed by a 3rd party: Project Support Ltd)* *Destroying data: Jan annually*
		NOAH: Hearing Aid data logging and hearing test results: Customer data removed from live database quarterly and archived. It is then kept for 8 years before being destroyed.	*Operations/Marketing Manager(MC)*	*Archiving: 1st week of each quarter* *Destroying data: Jan annually*
		OTHER: Marketing databases inc. Mailchimp: Customer data to be removed from this platform after a maximum of 4 weeks.	*Marketing Assistant (LM)*	*Destroying data: Task set every 4 weeks*
		OTHER: Physical patient record cards: Removed from live filing system and sent to secure lock up storage depot. Records kept for 8 years before being destroyed.	*Managing Director (KF)*	*Archiving: ongoing* *Destroying data: Jan annually*
		Monthly cleanse email trails by sending reminder to all staff to double delete "deleted items" box within Outlook.	*GDPR Lead (KM)*	*monthly*

		Annually review patient records where no contact has been made for 8 years. Consider securely destroying the records on a case by case basis.	Managing Director (KF)	Jan annually
		Annually review Right of Erasure Log. Act on outcomes.	GDPR Lead (KM)	Jan annually
Non Patient Records – customer or attendance at HCC event e.g. personal information and details of sales/marketing source	It might be sometime before an initial enquiry reaches fruition so retained for a reasonable period. After 3 years contact will be made asking whether they wish to continue receiving marketing literature. If no reply or negative response record will be erased. Otherwise after 5 years without further contact safely assume lead lost and records can be erased.	Annually review non patient records with 3 years without contact and ask whether they wish to continue receiving marketing literature. Act on outcomes. Annually review non patient records with 5 years without contact and erase. Act on outcomes.	Operations/Marketing Manager(MC) Operations/Marketing Manager (MC)	Jan annually Jan annually
Financial records e.g. payment details/name and address/order details	Kept for tax purposes and future claims for 6 years +1 Retention in line with HMRC - Compliance Handbook Manual CH15400 and then securely disposed of.*	Reviewed annually at year end. Monthly review credit check paperwork held and shred if px did not utilise in-house credit facility. Confirm on Act. Monthly cleanse email trails stored within accounts email account.	Managing Director (KF)/ Accounts Manager (KM) Accounts Manager (KM) Accounts Manager (KM)	Feb annually Monthly Monthly
Staff Records e.g.bank details/NI numbers/other personal information				Refer to data processor documents: Data Collection Form-For Impact assessment and Prep for Privacy Notice and Privacy Notice

*HMRC - Compliance Handbook Manual CH15400 as listed on https://www.gov.uk/hmrc-internal-manuals/compliance-handbook/ch15400

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