

## Croudace Homes Group Limited Data Retention Policy

This policy applies to Croudace Homes Group Limited and to all companies within the Croudace Homes Group Limited group ("Croudace Homes Group" or "Croudace") The table below details retention periods for different categories of personal data and documents. This sets out Croudace Homes Group's policy on periods for which personal data is to be retained. However it is not prescriptive, and in certain circumstances it may that personal data should be retained for longer periods, for example if Croudace Homes Group is involved in a dispute then the relevant personal data should be retained for longer of the normal retention period or the duration of the dispute (including any potential appeals).

The reason for these periods being set is that the UK General Data Protection Regulation requires that Croudace Homes Group retains personal data for no longer than is necessary. The time periods in the table below are Croudace Homes Group's view on what time periods are necessary.

The table also has an additional column which provides information in relation to the likely position under a request for erasure or to be "forgotten".. However this is only indicative, and if such a request is received then specific legal advice should be sought from the Legal Department.

### Key for type of data subject



Customers who have completed on a property.




Customers who have completed on a property or customers who have reserved but did not complete.





Customers who have completed on a property, customers who have reserved but did not complete or customers who have made enquiries or just received marketing, i.e. prospects.



Employees

 Recruitment candidates

 Data subjects generally

 Non-personal data documents

#### **NB**

An additional retention period of 6 months has been allowed, so that if a claim is made right at the end of the limitation period there is time to locate and extract the information or place on hold the automatic deletion of the information. This period could be reduced or increased, but Croudace Homes Group will be at risk of having to deal manually with a request for a right to be forgotten during this period. This risk will need to be balanced against the duration of the period. Rights to be forgotten only apply to personal data processed where specific legal bases for processing are relied on and therefore the right may not apply in all cases.

The 6 month periods are only suggested, if it is conceivable that there might be long periods between correspondence then this period could be extended.

For consistency and ease of consideration, all time periods run from completion for customers who completed on a purchase. However strictly some of the limitation periods may run from exchange rather than completion.

**Part 1** of the below matrix relates to personal data held by Croudace Homes Group about prospects or customers of Croudace Homes Group. **Part 2** of the matrix relates to the retention periods for non-personal data documents and information.

Information type	Normal retention period	Point at which right to be forgotten could be validly requested
<b>Part 1 - <u>PERSONAL DATA DOCUMENTS</u></b>		
Basic details about the customer, e.g. name, address, phone number, email address who completes on a freehold property.	15.5 years post completion to be safe.	15 years post completion.

Basic details about the customer, e.g. name, address, phone number, email address who completes on a leasehold property.	15.5 years post completion to be safe or 6.5 years after Croudace ceases to be the freeholder entitled to ground rent (whichever period is the longer).	15 years post completion or 6 years after Croudace ceases to be the freeholder entitled to ground rent (whichever period is the longer).
Basic details about the customer, e.g. name, address, phone number, email address where reservation takes place, but no completion.	6.5 years post completion to be safe, or if no completion 6.5 years from date of last contract usually the date of reservation.	6 years post completion, or if no completion from date of last contract usually the date of reservation.
Basic details about the customer, e.g. name, address, phone number, email address where no reservation takes place.	12 months since last contact.	At any time
Information relating to matters covered by NHBC guarantee or equivalent new home guarantees.	15.5 years post completion to be safe.	15 years post completion.
Information relating to matters at the property which might be covered by or subject to latent defects.	15.5 years post completion to be safe.	15 years post completion.
Information relating to title of land on which house is constructed.	12.5 years post completion to be safe.	12 years post completion.
Information relating to marketing of the property purchased.	15.5 years if relevant for NHBC guarantee (or equivalent) or latent defects or 6.5 years if relates to fixtures/fittings	Either 15 or 6 years depending upon category.
Information relating to snagging of defects, complaints etc.	15.5 years if relevant for NHBC guarantee (or equivalent) or latent defects or 6.5 years if relates to fixtures/fittings.	Either 15 or 6 years depending upon category.
Information which may be relevant to a claim under Section 1 of the Defective Premises Act 1972 for completions before 28 <sup>th</sup> June 2022 or claims under Sections 148 or 149 of the Building Safety Act 2022.	30.5 years post completion	30 years post completion.
Information relating to part exchange sale of customer's previous property (assuming Croudace does not take title to the customer's previous property).	6.5 years post completion to be safe.	6 years from completion.

Information relating to part exchange sale of customer's previous property (assuming Croudace does take title to the customer's previous property).	12.5 years post completion of the sale of the property by Croudace to be safe.	12 years from completion of the sale of the property by Croudace.
Information relating to options selected on fixtures/fittings (and any adjustments to them) at the property which were the subject of a separate linked contract.	6.5 years post completion to be safe.	6 years from completion.
Information relating to options discussed but not finally selected in relation to fixtures/fittings at the property.	6.5 years post completion as they may be relevant to a potential breach of contract claim.	6 years post completion as during that period they may be relevant to a potential breach of contract claim. If not then right to be forgotten at any time.
Payment details for reservation fee and/or payments for options selected on fixtures and fittings or matters resolved by Customer Care.	Payment details will be deleted immediately once payments have been made.	N/A
Information relating to any other sale scheme or promotion or contract arrangements, e.g. assisted sale.	6.5 years post completion to be safe or, if no exchange occurred, 12 months from last correspondence.	6 years from completion or, if no exchange occurred, 12 months from last correspondence.
Information relating to special category personal data, most likely physical disability or access information.	Probably 15.5 years due to the potential to have latent defect issues or NHBC guarantee (or equivalent) issues.	At any time if they withdraw consent to processing (but may change as case law and guidance makes the position clearer) unless Croudace can argue it is processing the special category personal data to comply with a legal requirement or to defend a legal claim.
Information relating to marketing relating to (other) properties.	Until completion and then possibly for a further 12 months or, if no exchange occurred, 12 months from last correspondence.	At any time
Miscellaneous information relating to for example when the customer will be at the property, customer satisfaction surveys,	Possibly for 2 years, but commercially may retain for longer and leave to be destroyed	At any time

details of financial advisors, property purchase funding, confirmation of consents to marketing etc.	at more convenient time points along with other information.	
Information relating to identity and money laundering checks.	5.5 years after the last financial transaction	5 years after last transaction.
Information such as email correspondence	16 years as it may be relevant to NHBC or latent defects. If no exchange occurred 12 months from last correspondence.	Either 15 or 6 years or right to be forgotten at any time depending upon the information. This would need to be assessed at the time of any such data subject request.
<b>Recruitment records</b> These may include: <ul style="list-style-type: none"> <li>• Completed online application forms or CVs.</li> <li>• Equal opportunities monitoring forms.</li> <li>• Assessment exercises or tests.</li> <li>• Notes from interviews and short-listing exercises.</li> <li>• Pre-employment verification of details provided by the successful candidate. For example, checking qualifications and taking up references. (These may be transferred to a successful candidate's employment file.)</li> <li>• Criminal records checks. (These may be transferred to a successful candidate's employment file if they are relevant to the ongoing relationship.)</li> </ul>	12.5 months after notifying candidates of the outcome of the recruitment exercise.	12 months after notifying candidates of the outcome of the recruitment exercise.
Information relating to any data subject rights being invoked including Croudace's response to the relevant data subject rights request together with any copies of personal data provided and any ICO investigation or correspondence.	6.5 years after Croudace has fully responded to the data subject right request.	6 years after Croudace has fully responded to the data subject right request.
For all Employee related retention periods as highlighted in green below (with the exception of current bank details) the retention period for Site Staff will be 27.5 years, and the right to be forgotten will be 27 years. This is due to the potential for medical based claims where the medical condition does not reveal itself for an extended period. The periods below relate to non-site based staff only.		

Employment contracts	While employment continues and for 6.5 after the contract ends.	6 years after employment contract ends
Payroll and wage records such as details on overtime, bonuses, expenses, benefits in kind	These must be kept for 6 years from the financial year-end in which payments were made. However, given their potential relevance to pay disputes they will be retained for 6.5 years after employment ends.	6 years following termination of employment
Current bank details.	Bank details will be deleted as soon after the end of employment as possible once final payments have been made.	N/A
PAYE records.	These must be kept for at least 3 years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they should be retained for 6.5 years after employment ends.	6 years following termination of employment.
Records in relation to hours worked and payments made to workers.	While employment continues and for 6.5 after the contract ends.	6 years following termination of employment.
Images in video or photographic form.	Possibly for 2 years, but commercially may retain for longer and leave to be destroyed at more convenient time points.	At any time.
Information relating to special category personal data, most likely health or medical information.	Probably 6.5 years following termination of employment, but possibly longer if relevant to a personal injury claim.	At any time if they withdraw consent to processing (but may change as case law and guidance makes the position clearer) unless Croudace can argue it is processing the special category personal data to comply with a legal requirement or defend a legal claim.
Employee file records such as: <ul style="list-style-type: none"> <li>Qualifications/references.</li> </ul>	While employment continues and for 6.5 years after employment ends but possibly longer if relevant to a discrimination or	6 years following termination of employment.

<ul style="list-style-type: none"> <li>• Consents for the processing of special categories of personal data.</li> <li>• Annual leave records.</li> <li>• Annual assessment reports.</li> <li>• Disciplinary procedures.</li> <li>• Grievance procedures.</li> <li>• Death benefit nomination and revocation forms.</li> <li>• Resignation, termination and retirement.</li> </ul>	<p>personal injury claim. Croudace may be able to hold on to information for an extended period as the limitation period for discrimination claims/personal injury claims might not start to run until a long time after the employee has worked for Croudace. .</p>	
<p>Maternity Records such as:</p> <ul style="list-style-type: none"> <li>• Maternity payments.</li> <li>• Dates of maternity leave.</li> <li>• Period without maternity payment.</li> </ul>	<p>These must be kept for at least four years after the end of the tax year in which the maternity pay period ends, but given relevance to maternity pay disputes they should be retained for 6.5 years after employment ends.</p>	<p>6 years following termination of employment.</p>
<p>Injury/accident reports in connection with work.</p>	<p>While employment continues and for 6.5 years after employment ends but possibly longer if relevant to a personal injury claim. Croudace may be able to hold on to information for an extended period as the limitation period for personal injury claims might not start to run until a long time after the employee has worked for Croudace.</p>	<p>6 years following termination of employment.</p>
<p>Information such as email correspondence will have to be considered after review of each email (in the manner of a subject access request).</p>	<p>6.5 years depending upon whether or not relevant to a discrimination claim/personal injury claim. If it is relevant then a longer period can be used as the limitation period for discrimination claims/personal injury claims might not start to run until a long time after the employee has worked for Croudace.</p>	<p>6 years or right to be forgotten at any time depending upon category.</p>

Any shareholding records (including shares held, share options, share purchases, share disposals, dividend entitlements and payments, votes, proxy appointments).	6.5 years after shareholder ceases to hold shares.	6 years after shareholder ceases to hold shares.
CCTV records	30 days unless specifically needed for longer retention. Longer retention will apply where the CCTV records are needed for evidence or a data subject access request has been made.	30 days
<b>Part 2 – <u>NON- PERSONAL DATA DOCUMENTS</u></b>		
Corporate records including certificate of incorporation, memorandum and articles of association, statutory registers, minute books, board papers etc.	Permanently (10 years for board minutes taken post October 2009).	N/A
Corporate documents executed as a deed.	12 years after expiry of agreement	N/A
Commercial agreements.	6 or 12 years after expiry depending on whether document is a deed.	N/A
Accounting records to comply with Companies and Tax law.	6 years after relevant year end.	N/A
Budgets and internal financial reports and working papers.	3 years after end of budget year end.	N/A
Statutory accounts working papers and records.	6 years after relevant year end.	N/A
Sales and purchasing records (anonymised data).	6 years after relevant year end.	N/A
Signed copy of report and accounts.	Permanently.	N/A
Portfolio valuations.	6 years after relevant year end.	N/A
Insurance policies e.g. public, employee liability.	Expiry of insurance year plus 6 years.	N/A
Health and safety documentation such as policies, risk assessments and method statements.	Whilst valid plus 6 years.	N/A



Claims files including defence packs <b>(NB this may contain personal data)</b> .	Date of settlement + 6.5 or 12.5 years (where executed as a deed).	N/A  Unless the documentation contains personal data, in which case then 6 or 12 years.
VAT records.	6 years after relevant year end.	N/A
VAT Certificates.	Permanently.	N/A
Tax returns and records.	6 years after relevant year end.	N/A

Version April 2024