



Phone Credit for Refugees Data Retention Policy

Background

This policy is designed to ensure that data is stored and kept only for as long as is necessary.

Phone Credit for Refugees (PC4R) needs to retain documents for a number of reasons:

- Operational purposes
- To demonstrate compliance with the law
- To report on our charitable activities and review our charitable spending
- For safeguarding purposes

Data storage

It is important for PC4R to have a regular overview of where personal data is stored.

This may include (but is not limited to):

- Email accounts
- Facebook messages
- The Phone Credit for Refugees Admin group
- The database
- Portable hard-drives

Data Retention period

Generally personal data should only be retained for as long as is necessary. Some data can be automatically destroyed after an agreed specified period. Other data will need to be reviewed at agreed intervals to see whether it should be destroyed or retained for a further period.

The schedule at the end of this policy gives details of how the different kinds of data we store will be managed.

Legal Requirements

Legal requirements apply and could affect the retention of records are. This includes:

- The General Data Protection Regulation May 2018
- The Limitation Act 1980
- The Human Rights Act 1998
- The Equality Act 2010

In the absence of any legal requirements, personal data may only be retained for as long as necessary for the purpose of processing. Exceptions may apply to the processing for historical, statistical or scientific purposes. After the end of a retention period of personal data, the information may not have to be completely erased if the data is anonymised.

PC4R Data Dumping day

In order to comply our legal obligations, PC4R will no less than once a year organise a data dumping day whereby all volunteers will review the personal data they have accumulated, where it is stored, and destroy what is necessary in accordant to the retention period.

Roles and Responsibilities

The Data Protection Officer will ensure that there is consistency in the retention and disposal of data.

All volunteers are accountable to the Management Committee for compliance with this policy.

Review

This policy will be reviewed annually.

(See appendix on next page)

Operational data

*Note that all data that is held indefinitely can be deleted upon request.

Type of data	Description of the data	Retention Period	Disposal Action
Full name	Full name of requesters	Six months, then archived	Archive
Facebook URL	Facebook URL of requesters	Six months, then archived	Archive
Phone Number	Phone number of requesters	Six months, then archived	Archive
Phone Network	Network of requesters	Six months, then archived	Archive
IMEI Number	IMEI number of requesters	Six months, then archived	Archive
Hand pictures	Hand pictures sent by requesters	Indefinite	Delete
Identity documents	Identity documents sent by requesters	Indefinite	Delete
Chat transcripts	Chat transcripts, including those between admins and requesters, and admins alone	Indefinite	Delete
Email correspondences	Email correspondences sent via info@pc4r.org	Retain for one year	Delete

Commercial/ Financial data

Type of data	Description of the data	Retention Period	Disposal Action
Full name	Name of people who purchased items in our online store	Indefinite	Delete and destroy

Address	Address of people who purchased items in our online store	Indefinite	Delete and destroy
E-mail address	Email of people who purchased items in our online store about cases	Indefinite	Delete and destroy

Volunteering

Type of data	Description of the data	Retention Period	Disposal Action
Volunteer application forms	Volunteer application forms	We will keep volunteer records until they have ceased volunteering with us.	Destroy once volunteers cease volunteering with us.
Volunteer training records and policy compliance records	Records of volunteer training	We will keep volunteer records until they have ceased volunteering with us.	Destroy once volunteers cease volunteering with us.