

General Data Protection Regulation (GDPR) and Data Protection Act 2018

Data Retention Policy of:

The aae technologies limited group of companies c/o;

**applied acoustic engineering limited,
modulus technology limited &
ensign subsea systems limited**

Radian House, Lancelot Road, Beacon Park, Gorleston-on-Sea, Norfolk, UK, NR31 7BF

1. Purpose

The purpose of this Policy is to ensure that all documents (electronic or otherwise) of aae technologies limited (“the organisation”) are adequately protected and maintained and to ensure that documents are held in accordance with data protection principles and the regulatory and legal framework.

Personal data is covered by the General Data Protection Regulation (GDPR) and the Data Protection Act and should not be retained for longer than is necessary. Personal data is any that can allow individuals to be identified, such as a date of birth or business e-mail address.

2. Policy

This Policy represents the organisation’s policy regarding the retention and disposal of documents. Documents, in this Policy, refers to physical as well as all types of electronic records - including e-mail, Web files, database files, text files, sound and movie files, PDF documents, all Microsoft Office or other formatted files, etc.

3. Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for all documents of the organisation. The Managing Director (the “Administrator”) is the officer in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

The Administrator is also authorised to:

- make modifications to the Record Retention Schedule from time to time to ensure that it complies with relevant legislation and regulations and includes the appropriate document categories for the organisation;
- monitor changes to legislation and regulations affecting record retention;
- annually review the record retention and disposal program; and,
- monitor compliance with this Policy.

4. Applicability

This Policy applies to all physical records generated in the course of the organisation's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

APPENDIX A – RECORD RETENTION SCHEDULE

How long a record is retained for will depend on the record's purpose and any regulatory or legal requirements for retention. The Record Retention Schedule is organised as follows:

RECORD RETENTION PERIODS (Minimum)

A. FINANCIAL AND PAYROLL DATA

Type of Data	Lawful Basis	Retention Period
Statutory accounts	Legal obligation	Six years plus the current year
Tax documents including VAT records	Legal obligation	Six years plus the current year
Statutory sick pay, statutory maternity pay records etc	Legal obligation / Contract	Six years plus the current year
Payroll records and other HMRC documentation	Legal obligation	Six years plus the current year
Pension records	Contract	Twelve years after the benefit ceases

B. HUMAN RESOURCES DATA

Type of Data	Lawful Basis	Retention Period
Application forms and interview notes for unsuccessful candidates	Legitimate Interests	Twelve months after notifying the unsuccessful candidate
Application forms for successful candidates	Contract	For the duration of the employment
References obtained from third parties	Contract	For the duration of the employment
Sickness and leave records	Contract	Six years after employment ends
Training records including for first aid, fire warden and health and safety representatives	Legal obligation / Contract	Six years after employment ends
Annual appraisal records	Legal obligation / Contract	For the duration of the employment
Redundancy details	Legal obligation	Six years after employment ends
Working time records including overtime, annual holiday, jury service, time off for dependents etc	Legal obligation / Contract	Six years after employment ends
Personnel files and training records (including formal disciplinary records)	Contract	Six years after employment ends*
Right to Work in the UK checks	Legal obligation / Contract	Six years after employment ends

*After this time the file will be destroyed and a summary or record of service, e.g. name, position held, dates of employment, etc. will be retained for ten years from end of employment. This will enable references to be provided for future employment.

Written By: J. Eman
Amended By: P. Ball
Checked By: J. Eman
Approved By: A. Darling

C. HEALTH AND SAFETY DATA

Type of Data	Lawful Basis	Retention Period
Accident books, records and reports (not involving chemicals or asbestos)	Legal obligation	Three years from date of last entry
Medical records and details of biological tests under the Control of Lead at Work Regulations	Legal obligation	40 years from date of last entry
Medical records as specified by the Control of Substances Hazardous to Health Regulations (COSHH)	Legal obligation	40 years from date of last entry
Medical records under the Control of Asbestos at Work Regulations: medical records containing details of employees exposed to asbestos and medical examination certificates	Legal obligation	40 years from the date of the last entry (medical records); 4 years from the date of issue (medical examination certificates)
Medical records under the Ionising Radiations Regulations 1999	Legal obligation	Until the person reaches 75 years of age, but in any event for at least 50 years

D. STATUTORY AND OTHER DATA

Type of Data	Lawful Basis	Retention Period
Minute books and statutory records (including Memorandum and Articles of Association)	Legal obligation	Permanently
Non-personal corporate and operational data not covered elsewhere in this policy	No lawful basis required. Non-personal data of value to the organisation	To be reviewed every six years but otherwise retained permanently
Customer Personal Data	Contract / Legitimate Interest	Six years from the end of engagement. To be reviewed annually.
Supplier Personal Data	Contract / Legitimate Interest	Six years from the end of engagement. To be reviewed annually.
Subject Access Requests	Legal obligation	One year following completion of the request

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Document Protection

Documents containing personal and/or commercially sensitive information (Hard copy, electronic or other media) will be stored in a protected environment for the duration of the Document Retention Schedule. Computer backup media will be included.

The company does not process or control any special category data, as defined by the GDPR.

Document Destruction

Hard copy of documents will be destroyed by confidential data shredding or other proven means after they have been retained for the period specified in the Record Retention Schedule. Copies of computer backups will be destroyed by proven means to destroy such media after they have been retained until the end of the Record Retention Schedule.

A. Darling

11/01/2026

Signed: -----

Date: -----

Group Chairman