

Data Retention Policy

References in this Policy to "Window to the Womb", "WTTW", "we", "us", "our Group", "organisation" and "our" mean Window to the Womb (Franchise) Limited (a company registered in England and Wales with registration no 08756928 and registered office at National House, 80-82, Wellington Road North, Stockport, Cheshire SK4 1HW), Firstscan Limited (a company registered in England and Wales with registration no 10512110 and registered office at National House, 80-82, Wellington Road North, Stockport, Cheshire SK4 1HW) and our licenced franchisees who own and operate our clinics nationally and a list of which is included as point 4 below. We control the ways your personal data is collected and the purposes for which your personal data is used and we are the "data controller" for the purposes of the UK Data Protection Act 2018 and other relevant European data protection legislation.

References to "our App" mean either the Window to the Womb app or the Bumpies app.

References to our 'Websites' mean www.windowtothewomb.co.uk and www.baby-scan.co.uk

We provide our services through a group of independent limited companies that are all licenced franchisees of WTTW and all operate according to the strict standards set by us.

1. Purpose

The purpose of this policy is to detail our principles and practices in relation to the retention of personal data and disposal of information. The policy will ensure that these aspects of our business are carried out consistently and in a manner that protects data confidentiality and privacy.

The policy provides our employees with the guidance needed to ensure they are retaining and disposing of documents in line with our policy.

Our objective is to ensure that records and documents are protected and maintained and to ensure that records that are no longer required, or may no longer be legally held, are disposed of securely and within a timely manner.

2. Scope

This policy applies to all personal data in all formats. Unless otherwise specified, it relates to, but is not limited to: hard and soft copy documents and files, emails, web files, text files, audio files, photographs and video records.

It is applicable to all processes, procedures, systems, employees and third party stakeholders that have access to, or are involved in the processing of, personal data.

The scope outlined in this policy is the minimum standard which must be applied across the Organisation.

3. Policy

3.1 Considerations

The following principles must be considered:

- Legislation and regulation. For example, the GDPR in the case of the data of private citizens
- The confidentiality and sensitivity of the information in question
- Contractual agreements
- Data must not be retained for any longer than required
- Data should be accessible according to the organisation's needs

3.2 Guidelines by Record Category

The table below sets out the categories of personal data records that are held by the organisation as well as the related retention period, retention justification, data owner and the permitted formats.

These periods have been justified in relation to the appropriate law or professional body. There may be circumstances where longer retention periods are required for business reasons however this would need to be fully justifiable and documented.

The Directors of the organisation are jointly responsible for the secure retention and disposal of the personal data assets.

Summary Description	Detailed Description	Retention Period	Justification	Permitted Formats	Owner
Signed scan records	Scan Reports or Wellbeing Reports including Terms and Conditions signed by customers	10 years	Insurance and medical information retention requirements	Hard copy and scanned electronic copies	Data Controllers
Customer Data	Name, phone, number, email, credit/debit card	1 year after last purchase	Data protection legislation	Electronic	Data Controllers
CCTV	Video records of employee and visitor movements	30 days after recording	Maximum period for criminal or other investigation. In line with CCTV Policy.	Video	Authorised Person in each franchise as specified on the CCTV Policy
Employee records	Name, phone, email, address, date of birth, NI number, salary and benefits, contract details, employment history, performance reviews, disciplinary, education	1 years following end of employment	To process wages, pension contributions and other employer responsibilities.	Electronic / paper / email	Data Controllers
Job applicant records for unsuccessful applicants	Name, phone, address, email, work history, education	1 month following application process ends	To allow the selection process to be completed satisfactorily	Electronic and paper	Data Controllers
Payment receipts	PDQ receipts	3 months	Financial reconciliations Accounts requirements	Paper copies	Data Controllers

3.3 Record Security

We employ strong security measures to ensure the confidentiality, integrity and availability of personal data, including the encryption of data where appropriate and for the duration of its retention period. Where data is encrypted, encryption keys are securely stored.

Records on non-electronic media must be safely stored to ensure they cannot be breached. A breach occurs when any personal data is:

- lost, destroyed, corrupted or disclosed;
- if someone accesses the data or passes it on without proper authorisation;
- if the data is made unavailable and this unavailability has a significant negative effect on individuals.

Records archived offsite must be protected by the storage company through strong contractual terms and evidence of robust security as detailed in the current data protection regulations (currently Article 28 of GDPR).

Data records can deteriorate, depending on the media used to store them, for example paper or electronic. The organisation recognises that long-term storage of paper records may represent a deterioration risk; and paper records should be scanned and stored electronically, where appropriate.

In the case of records stored on electronic media similar security measures must be employed to ensure longterm integrity, such as copying or converting to more resilient media. The records must remain accessible and readable at all times.

3.4 Record Review

Records should be regularly reviewed, based on the retention periods and the expiry of those periods. Personal data records should be regularly reviewed to determine whether they should be destroyed or retained for a further period.

3.5 Disposal Methods

Records can be destroyed in the following ways:

- Hard copy data concerning living individuals - cross-cut shredded and pulped or burnt
- Electronic records - using a method that renders them non-recoverable even using forensic data recovery techniques
- Electronic equipment and removable media containing personal data - using a method that renders the data non-recoverable even using forensic data recovery techniques
- Discs and data cards can be shredded in such a way that data is not recoverable

4. Our Licenced Franchisees

Our franchisee

ANA Services Ltd
 Baby Bonding Ltd
 New Beginnings South Ltd
 Kent Ultrasound Studio Ltd
 D Ventress Ltd
 Devon Ultrasound Ltd
 Sussex Baby Scans Ltd
 Woodhaze Ltd
 Baby Scans UK Ltd
 London Scans Ltd
 1st Glimpse Ltd
 Babygenic Ltd
 Cocoro Group Ltd
 DJC Studios Ltd
 SPS Retail Services Ltd
 1st Glimpse Ltd
 Scantastik Ltd
 DI Harries Liverpool Ltd
 DI Harries Manchester Ltd
 D I Harries Ltd
 D I Harries Darlington Ltd
 Judge Ltd
 Divinity Ltd
 Divine Sparks Ltd
 Pretiosum Ltd
 Vision Beyond Ltd
 SPS Retail Services Ltd
 Divinity MK Scans Ltd
 DI Harries Glasburgh Ltd
 Cocoro Group Ltd
 ANA Services Ltd
 Baby Scan Clinic Ltd
 LIL M Ltd
 Peterborough Ultraasound Scans Ltd
 DI Harries Middlesbrough Ltd
 Baby Scans Cheshire Ltd

Clinic location

Chessington
 Southampton
 Watford
 Maidstone
 Leeds
 Exeter
 Worthing
 Swansea
 Stoke
 Ealing
 Walthamstow
 Gloucester
 Bexleyheath
 Norwich
 Birmingham
 Witham
 Bristol
 Liverpool
 Manchester
 Newcastle
 Darlington
 Doncaster
 Reading
 Leicester
 Belfast
 Coventry
 Wolverhampton
 Milton Keynes
 Glasgow
 Croydon
 Bagshot
 Aylesbury
 Blackburn
 Peterborough
 Middlesbrough
 Ellesmere Port

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