

## Data Retention Policy

The background features a central globe with a light blue and white color scheme. Surrounding the globe are several large, semi-transparent circles in shades of yellow, light blue, and purple, arranged in a circular pattern. The overall design is clean and modern.

Information is at the core of **ICM Pro Logistics** business as it enables us to provide the highest levels of service to both our candidates and clients alike. During its normal daily activities **ICM Pro Logistics** generates and accumulates a wide range of data records which are stored in various formats and locations.

Examples of these data records include (but are not limited to) emails, text messages, personal contact information, profile images, current and past employment details, references, interview notes, call recordings, video interviews, marketing preferences and preferences for future employment.

For candidates successfully placed into new employment roles we may store additional data records such as passport, drivers licence, bank details, National Insurance number, tax code, p45, payslips.

For the purposes of this Policy, the term 'data records' include information in both hard copy and electronic form.

In certain circumstances it will be necessary to retain specific documents in order to fulfil statutory or regulatory requirements. The table below indicates our retention periods for the various data records that we hold.

# Data Retention Guidelines

## **ABOUT THESE GUIDELINES**

These guidelines support **ICM Pro Logistics** Data Privacy Policy.

The guidelines are intended to ensure that **ICM Pro Logistics** processes personal data in the form of employment records in accordance with the personal data protection principles, in particular that:

- Personal data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
- Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When personal data is no longer needed for specified purposes, it is deleted or anonymised as provided by these guidelines.
- Personal data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.
- Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.
- Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

The Data Protection Officer is responsible for overseeing these guidelines. Any questions about the operation of the guidelines should be submitted to **admin@internationalcareermaster.com**

## **LOCATION OF EMPLOYMENT RECORDS**

**ICM Pro Logistics** HR department holds employment records and can be contacted with any enquiries relating to your personal data.

## KEEPING INFORMATION UP TO DATE

**ICM Pro Logistics** needs to ensure that your personal details are up to date and accurate.

When you first start working for **ICM Pro Logistics** we record **your name, address, next of kin** and your **contact telephone** details. In the event that any of these changes you should inform the HR department **OR** your Talent Specialist, You will be invited to review and update personal information on a regular basis.

These provisions are intended to complement the data subject rights referred to in the Data Privacy Policy.

## GENERAL PRINCIPLES ON RETENTION AND ERASURE

**ICM Pro Logistics** approach to retaining employment records is to ensure that it complies with the data protection principles referred to in these guidelines and, in particular, to ensure that:

- Employment records are regularly reviewed to ensure that they remain adequate, relevant and limited to what is necessary to facilitate you working for **ICM Pro Logistics**.
- Employment records are kept secure and are protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Where appropriate **ICM Pro Logistics** uses anonymisation to prevent identification of individuals.
- When records are destroyed, whether held as paper records or in electronic format, **ICM Pro Logistics** will ensure that they are safely and permanently erased.

## RETENTION AND ERASURE OF RECRUITMENT DOCUMENTS

**ICM Pro Logistics** retains personal information following recruitment exercises to demonstrate, if required, that candidates have not been discriminated against on prohibited grounds and that recruitment exercises are conducted in a fair and transparent way.

**ICM Pro Logistics** candidate privacy notice advises candidates how long **ICM Pro Logistics** expects to keep their personal information for, once a recruitment decision has been communicated to them. This is likely to be for 3 years from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by **ICM Pro Logistics**.

Information relating to successful candidates will be transferred to their employment record (Adapt) with **ICM Pro Logistics**. This will be limited to that information necessary for the working relationship and, where applicable, that required by law.

Following a recruitment exercise information, in both paper and electronic form, will be held by the HR department. Destruction of that information will take place in accordance with these guidelines.

### **RETENTION AND ERASURE OF EMPLOYMENT RECORDS**

**ICM Pro Logistics** has regard to recommended retention periods for employment records set out in legislation, referred to in the table below. However, it also has regard to legal risk and may keep records for up to seven years (and in some instances longer) after your employment or work with us has ended.



| Record Type  | Retention Period   | Basis for Processing/Holding Data   |
|--|--|---|
| Candidate's Personal Information.<br>Sourced from: <ul style="list-style-type: none"> <li>• Executive search on 3<sup>rd</sup> Party Sites</li> <li>• Advert applications</li> <li>• Social Media Sites</li> <li>• Walk-Ins</li> <li>• Call-ins</li> <li>• CVs</li> <li>• Profile Images</li> <li>• Telephone conversations</li> <li>• Email correspondence</li> <li>• Interviews</li> <li>• In person conversations</li> <li>• Video Interviews</li> <li>• Previous vacancy applications</li> <li>• recruitment workflows &amp; outcomes</li> </ul> | <b>3 Years</b> (from the last date of engagement or providing work finding services) unless request to be forgotten is received. | <b>Legitimate Interest</b>  |
| Candidate's Personal Information. Sourced from: <ul style="list-style-type: none"> <li>• Direct website registrations</li> </ul>   | <b>3 Years</b> (from the last date of engagement or providing work finding services) unless request to be forgotten is received. | <b>Consent</b> (Explicit consent is required when registering with us to provide work finding services) |
| Placement of a Candidate   | <b>3 Years</b> (from the last date of engagement or providing work finding services) unless request to be forgotten is received. | <b>Legal</b> – Conduct of Employment Agencies and Employment Business Regulations, Limitations Act      |
| Marketing Preferences <ul style="list-style-type: none"> <li>• Job Alerts</li> <li>• Email Marketing</li> <li>• Text Alerts</li> </ul>   | <b>3 Years</b> (from the last date of engagement or providing work finding services) unless request to be forgotten is received. | <b>Consent</b> (Marketing preferences can be amended at any time by individuals)                        |
| Hirer Records (client details, terms of business, assignment, vacancy details)   | 1 Year (from the last date of providing work finding services)   | Legal – Conduct of Employment Agencies and employment Business Regulations                              |
| Client Contact Information<br>Sourced by <ul style="list-style-type: none"> <li>• 3<sup>rd</sup> Party Sites</li> <li>• Information in the public domain</li> <li>• Social Media Sites</li> <li>• In person meetings</li> <li>• Telephone conversations</li> <li>• Email correspondence</li> <li>• recruitment workflows &amp; outcomes</li> <li>• Hiring Preferences</li> </ul>   | <b>3 Years</b> (from the last date of engagement or providing recruitment services) unless request to be forgotten is received.  | <b>Legitimate Interest</b>  |

|  |   |   |
|--|---|---|
| <ul style="list-style-type: none"> <li>• Vacancy descriptions/requirements</li> <li>• Canvass calls</li> <li>• Profile Images</li> </ul>   |   |   |
| Work seeker records (application form, CV, ID checks, details of assignments, interview notes, opt out notices)  | <b>1 Year</b> (from the last date of providing work finding services)   | <b>Legal</b> – Conduct of Employment Agencies and Employment Business Regulations |
| Personnel records  | While employment continues and for 7 years after employment ends  |   |
| Terms of Engagement with a Temp Worker and Terms of Business with Clients  | <b>6 Years</b> (In order to deal with any civil action in the form of a contractual claim.)   | <b>Legal</b> – Limitations Act  |
| Working Time Records <ul style="list-style-type: none"> <li>• 48hr opt out notice</li> <li>• Annual Leave Reports</li> </ul>   | <b>3 Years</b> (from the time the records were created)   | <b>Legal</b> - Working Time Regulations 1998                                      |
| References   | <b>1 Year</b> (after the introduction or supply of a work seeker to a client)   | <b>Legal</b> – Conduct of Employment Agencies and Employment Business Regulations |
| Right to Work in the UK Records  | <b>3 Years</b> (after the employment/ engagement has ended)   | <b>Legal</b> - Immigration Act  |
| National Minimum Wage Documentation: <ul style="list-style-type: none"> <li>• Total Pay &amp; hours worked</li> <li>• Overtime</li> <li>• Deductions</li> <li>• Any absences: Sickness, holiday etc</li> <li>• Travel or training</li> </ul> | <b>3 Years</b> (after the end of their last pay reference period)   | <b>Legal</b> - National Minimum Wage Act  |
| Statutory Maternity, Paternity or Adoption Pay   | <b>4 Years</b> (after the end of the tax year in which it relates)  | <b>Legal</b> (HMRC)   |
| Pensions (auto-enrolment date, joining date, opt in and opt out notices, contributions paid)   | <b>6 Years</b>  | <b>Legal</b>  |
| Accident Records   | <b>3 Years</b> ( from the date the report was made)   | <b>Legal</b>  |
| Payroll and wage records   | <b>3 Years</b> (after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they will be retained for 7 years) | <b>Legal</b>  |