

Data Destruction Policy

This Data Destruction Policy sets out how Money Lifeline (ML) seeks to comply with the GDPR requirement that personal data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

ML recognises that, under the GDPR, clients have the right to have their data erased on request. ML will comply with any such request as quickly as is reasonably practicable.

Client papers – hard copy

ML will shred all documentation within the client's paper file within two months after six years from closure. If there has been a mortgage arrears debt, that record will be kept for 12 years, but documentation for the client's other debts will be shredded after six years.

Client papers - electronic

a) Catalyst

Electronic records are primarily held on Catalyst (Community Money Advice's bespoke cloud-based case management software).

In this system:

- Cases are closed when completed
- Closed cases are deleted from the central server after 6 years
- In the instance of Money Lifeline ceasing to operate, our portal/server partition is closed down, records are archived for 6 years and then deleted by CMA.

b) Local

All client files held locally on computers or back up drives will be deleted at the same time as the paper file is shredded.

Exceptional circumstances

Exceptionally, ML personal data may need to be retained for longer than six years if it is required in connection with a complaint by the client to the Financial Ombudsman Service. In those circumstances, the data will be destroyed as soon as the complaint has been finally resolved.

Client List

ML maintains a spreadsheet which contains client names and the associated file references. This is used to record when a case is closed so we can identify when a client's paper documents & locally-held electronic records need to be shredded and deleted.

Names will be deleted from the spreadsheet after the related client files have been shredded.

Waiting List

ML has a waiting list of potential clients within the "No Debt Advice Clients" section of Catalyst. This includes contact details, copies of emails from support workers, notes of

telephone conversations or texts and any other information received ahead of any initial appointment.

If someone from the Waiting List becomes a client, the record in Catalyst is moved to the “Full Clients” section and becomes part of their client file.

If someone is removed from the Waiting List without ever becoming a client, the closed record in Catalyst is stored for three years after the person is removed from the list. ML would give priority to anyone who had been on the Waiting List and made a fresh approach for an appointment during that period. The Catalyst record is deleted at the end of the three years.

E-mails and contact details

E-mails will be deleted after three to four years. Any important e-mails are printed as PDFs and saved in the client’s case file in Catalyst.

Contacts will be deleted as soon as it is clear that they are no longer needed. The managers will undertake an annual check of the Outlook Contacts on each computer.

Other personal data

Contact details and other personal data for ML advisers are deleted as quickly as reasonably possible after they cease to be an adviser.

ML diaries should not contain personal data but will be shredded after 6 years.

Responsibility

The management team are responsible for ensuring that these actions are carried out at the appropriate time.