



General Data Protection Regulation (GDPR) Procedure

Last reviewed 19th March 2020

This procedure document details the practical measures we use to manage the physical and digital data we receive. It should be read in conjunction with our Privacy Policy and other Terms of Service which can be found on our website at https://twds.digital/document_library.php

Under the definitions of GDPR we do not collect or process personal data and we are not required to appoint a data protection officer (DPO). This procedure will be reviewed annually or more often if required by future legislation.

All physical and electronic data not specifically detailed in this document:

TWDS Digital Ltd was incorporated on **30th August 2011**. We will annually (between 30th August and the next working Wednesday) erase any and all data older than 8 complete years. The annual policy and procedure review will also take place at this time.

The first full data clean up will take place between Friday 30th August and Wednesday 4th September 2020 when any data remaining from the year ending 29th August 2012 will be erased.

Data we hold for human resources (HR) purposes:

Employee names and company contact details including company email address and company phone number may be publicly shared. All other employee data will be treated as confidential and will be erased after the 8 year period detailed above.

Emails and Contact details recorded by the email client:

Such data will be reviewed annually and deleted when no longer considered relevant (normally one year after last contact). Each current employee will normally review their own email client except on termination of their employment or after the 8 year period detailed above when the review will be overseen by their line manager.

Data we receive from job applications and curriculum vitae (CVs):

Such data will not be shared without express permission and will be erased when no longer considered relevant (normally one year after receipt).

Data we receive from agencies or individuals seeking business partnerships:

Such data will be erased when no longer considered relevant (normally one year after receipt).