

Data Retention Schedule FOR Forti5 Technologies Limited

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A. Company Records

Type of Material	Minimum Retention Period	Reason
Register of members	<p>You can remove entries added on or after 6 April 2008 from the register 10 years after the person stops being a member (section 121 CA 2006).</p> <p>You must keep entries made before 6 April 2008 for 20 years after the person stops being a member (schedule 4, paragraph 2 Fifth CA 2006 Commencement Order).</p>	Companies Act 2006, Companies Act 1985
Register of directors' residential addresses	You must keep this register for the life of the company (Section 162 CA 2006) and there is no provision to remove entries of former directors. Note: you cannot make this register available for public inspection.	Companies Act 2006, Companies Act 1985
Directors' service contracts	<p>You must keep a copy of the contract or a memorandum of its terms for at least one year from the expiry or termination date (Section 228 CA 2006).</p> <p>However, it is advisable to keep the contract for up to six years following expiry for tax purposes and to account for the 6-year limitation period for contracts.</p>	Companies Act 2006, Companies Act 1985
Board minutes	<p>For board meetings held on or after the 1 October 2007, you should keep copies of the minutes for 10 years from the date of the meeting (section 248 CA 2006). If the minutes contain personal data, you should not keep them for longer than the set 10-year period unless they are still 'necessary' for the purposes for which the data is processed.</p> <p>For meetings held before 1 October 2007 you should keep the minutes permanently (section 382 Companies Act 1985).</p>	Companies Act 2006, Companies Act 1985
Certificate of Incorporation and Memorandum of Association	There is no legal requirement to keep the Certificate of Incorporation or the Memorandum of Association. However, as these documents evidence the company's compliance with the registration requirements of the CA 2006 (section 15 CA 2006), it may be wise to keep the original documents for the life of the company.	Companies Act 2006, Companies Act 1985

B. Employee HR records

Type of Material Employee HR records	Minimum Retention Period	Reason
Material that is constantly updated, such as an employee's home address	Out-of-date material should, in principle, never be in the file	Data Protection Principles
Most recruitment and selection materials rejected candidates	12 months after the decision	The time limit for claim of discrimination, Employment Practices Code Part 1
Correspondence	To the extent that correspondence contains personal data. Should not be kept longer than is necessary for which personal data was processed	GDPR principle, DPA 5 th principle
Incidental correspondence with staff members	One year after the matter is closed	Data Protection Principles
Checks (such as references) made before taking someone on and any required copies of documents	6 years after the contract ends	Evidence that checks were made
Copy of identification documents for Right to Work Checks	6 years after employment ceases	Section 5 Limitation Act 1980
Material forming part of an employment contract, changes to T&C's	6 years after the contract ends	The time limit for legal claim Section 5 Limitation Act 1980

Data concerning a temporary worker	6 years after employment ceases	Section 5 Limitation Act 1980
Identification documents of foreign nationals (obligation to retain copies to perform immigration checks)	2 years	Article 6 Immigration Restriction on Employment Order 2007
Expat records and other records relating to foreign employees (eg, Visa work permit)	6 years after employment ceases	Section 5 Limitation Act 1980
Leave and absence records	6 years	May be relevant to claims of under-payment, unlawful deductions or breach of contract Section 5 Limitation Act 1980
Registration of work and rest periods if required if an obligation exists to show compliance	2 years	Working Time Regulations 1998
Pension-related records	Money Purchase: 6 years Final Salary: until age 72	Consult pension provider
Performance records (such as training or appraisal)	6 years after employment ends	The time limit for a legal claim

Disciplinary records	6 years after employment ends	The time limit for a legal claim
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C. Finance

Type of Material	Minimum Retention Period	Reason
Accounting records (including; bank statements and reconciliations; payment and receipt records; supplier/accounts payable invoices; customer/accounts receivable invoices; customer debit notes; purchase and sales ledger; and employee expense records)	6 years from financial year end Complete audit should be held for 10 years or as required for risk register purposes, or to the end of any tax enquiry, if longer.	Companies Act 1985 as amended by the Companies Acts 1989 & 2006. Generally Accepted Accounting Practice (UK GAAP).
Financial (including audit) import/export	7 years from financial year end (statutory limitation period).	As above
Accounting record (including audit): Taxation	10 years from tax year end or as required in the event of a tax investigation	As above
Annual audited financial statements and report	Life of Group entity	As above
Interim financial statements	Life of Group entity	As above

Internal financial statements	7 years from financial year end	As above
Annual plans and budgets	7 years from financial year end	As above
VAT records	7 years from tax year end	Value Added Tax Act 1994 (as amended).
Dividend withholding tax	7 years from tax year end	Section 1104 of Corporation Tax Act 2010.
Corporation tax self-assessment records	7 years from tax year end	Taxes Management Act 1970.
Stamp duty land tax records	7 years from tax year end	Paragraph 9, Schedule 10, Finance Act 2003 (as amended).
Landfill tax records	7 years from tax year end	The Landfill Tax Regulations 1996 (as amended).
Insurance premium tax records	7 years from tax year end	The Insurance Premium Tax Regulations 1994.
Charitable donation records	<p>Records re sponsorship arrangements or partnerships with third-party charities:</p> <p>6 years after the date of the last payment, but up to 12 years if any payments are still outstanding or there is disputes regarding a document executed as a deed.</p> <p>Documents evidencing donations made to charitable organisations: public companies: 6 years</p>	Section 388(4) Companies Act 2006.
Banking records:		Company Policy

Cheques and other negotiable instruments	Originals: 6 years from date of issuance	
Paying-in counterfoil	Originals: 6 years from date of issuance	
Bank statements and reconciliations	Original if provided in hardcopy or otherwise, if statements obtained via internet banking, online printouts: 6 years	
Instructions to the bank	6 Years	
Contracts (underhand) and relevant correspondence and other related documents (such as PO, credit checks)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Contracts (executed as a deed) and relevant correspondence and other related documents (such as PO, credit checks)	End of contract plus 13 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Tenders/bids for contracts made by Group / Entity (successful)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Tenders/quotes from suppliers (unsuccessful)	Last correspondence plus 2 years	Limitation Act 1980.
Tenders / quotes from suppliers (successful)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980
Tenders / bids for contracts made by Group / Entity (unsuccessful)	Last correspondence plus 2 years	Company Policy

D. Payroll

Type of Material	Minimum Retention Period	Reason
Pay records and relevant supporting documents	7 years from financial year end (statutory limitation period).	The time limit for a legal claim of under-payment or unlawful deductions
Material related to income tax and National Insurance	3 years after the end of the tax year they relate to	Statutory: Income Tax Regulations
Working time records	Date on which they were made plus 2 years	The Working Time Regulations 1998.
Records concerning pay due to employees during absence from work due to illness	End of the tax year to which they relate plus 3 years	The Statutory Sick Pay (General) Regulations 1982 as amended.
Records concerning parental leave / maternity pay or equivalent	End of the tax year in which the parental leave / maternity period ends plus 3 years	The Statutory Maternity Pay (General) Regulations 1986 as amended.
Minimum wage records	End of the pay reference period following the one that the records cover plus 3 years	National Minimum Wage Act 1998.

E. Marketing and Customers

Type of Material	Minimum Retention Period	Reason
Personal data used to contact existing customers (this may include email, telephone number, postal address) or select marketing audiences from the existing customers (this may include demographic information, marketing preferences and permission, communication history, and variables derived from the individual's transactional))	24 months from last interaction with, will be removed immediately when unsubscribed	Company Policy
Personal data used to contact prospective customers based on consent (this may include email and telephone number) or select audiences from prospective customers for marketing through electronic channels (this may include demographic information, marketing preferences, and communication history)	If the contact took place, 3 months from the contact date; if the contact did not take place, 6 months after initial collection. Will be removed immediately when unsubscribed	Company Policy
Personal data used for campaign performance measurement	13 months from the campaign end date.	Company Policy
Anonymised data used for analytical or statistical purposes	Review every 5 years to make sure retention remains useful, even if anonymised data is out of scope of GDPR.	Company Policy
Images, photography, film, case studies and related consent forms linked to the said media coverage for use in marketing materials and campaigns	3 years from consent expiry for use in marketing materials.	Company Policy
Media coverage – records held consisting of news stories placed or press coverage received.	Review after 5 years to determine if the coverage is historically important; part of a crisis piece; or relates to an organisational priority that needs further retention.	Company Policy

Competition and prize draw records, including adverts, rules and, if applicable, official answers to questions set	Date of last event of a competition (close of the competition, winner selection, expiry for a winner to claim/select prize) plus typically 1-2 years.	Company Policy
Customers (business and consumer)	End of contract plus 6 years.	Company Policy
Other data subjects identified within customer contracts	End of contract plus 6 years.	Company Policy
Call recordings	24 months.	Company Policy
Customer warranties	Warranty period plus 12 months	Company Policy
Customer credit records	Period of credit plus 6 years	Company Policy

F. Health and safety and environmental records

Type of Material	Minimum Retention Period	Reason
Health and safety policies, systems, procedures, standards and guidance.	Life of Group entity, as required for evidence of compliance.	Health and Safety at Work Act 1974 (as amended).
Health and safety documents and records (including Annual summary, audit reports, incident notifications, investigation reports, safety alerts, training records, risk assessments carried out in compliance with law and method statements, correspondence with regulators, advice and related safety record correspondence).	Life of Group entity	Management of Health and Safety at Work Regulations 1999. Evidence of compliance with statutory provisions in the UK or overseas legislation where appropriate.
Incident, disease and dangerous occurrence books (such as 'accident books') and records including electronic records for reported accidents and incidents.	3 years from date of last entry or 7 years from reporting. Or, if accident involves a child / young adult, then until that person reaches 21.	Evidence of compliance with UK Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 or local or overseas legislation where appropriate.
Data re emergency medical care, individual reintegration plans, workplace adjustments, individual treatment agreements, fitness for work	6 years after expiry of employment.	Limitation Act 1980, Data Protection Act 2018 and GDPR
Records and minutes of consultations with safety representatives and committees	10 years	Evidence of compliance with Safety Representative and Safety Committees Regulations 1977 and Safety (Consultation with Employees) Regulations 1996.

Environmental records and assessments (including electronic records and database entries)	Life of Group entity	Evidence of compliance with statutory provisions in UK or overseas legislation where appropriate.
Environmental data regarding dangerous chemicals, substances, or measures regarding these for manufacturing/import or distribution of products	10 years.	Article 49 Regulation 1272/2008/EC Article 36 of the Regulation 1907/2006/EC (REACH).
Names and addresses of customers/buyers of environmentally dangerous substances or measures	10 years.	Article 49 Regulation No 1272/2008/EC on classification, labelling and packaging of substances and mixtures.
Environmental permit documentation	Specific periods will apply and vary, depending on the nature of the permit. In general, you should keep permits for as long as they remain valid, and thereafter as necessary for evidence purposes in any potential regulatory or third-party claim, litigation or liability.	Company Policy
Fire risk assessment	Date of last fire risk assessment plus 5 years	Evidence of compliance with the Regulatory Reform (Fire Safety) Order 2005.
Medical examinations at work related to hazardous substances (ensuring maintenance of employee health record)	40 years from date of last entry made for UK where record representative of personal exposures of identifiable employees or in any other cases, at least 5 years, from last entry made.	Regulation 10(5), Control of Substances Hazardous to Health Regulations 2002, SI 2002/2677.

Records of tests and examinations of control systems and protective equipment concerning exposure to other substances hazardous to health	Date tests were carried out plus 5 years.	The Control of Substances Hazardous to Health Regulations 1999 and 2002 (COSHH).
Register of employees who work in dangerous conditions or whose health is otherwise at threat regarding exposure to substances hazardous to health	5 years. However, where the record is not representative of personal exposures of identifiable employees, 40 years from the date of last register entry.	Regulation 10(5), Control of Substances Hazardous to Health Regulations 2002, SI 2002/2677.
Register of employees who work with 3rd and/or 4th category biological agents	40 years from the date of the last registered entry.	Schedule 3, paragraph 4, Control of Substances Hazardous to Health Regulations 2002, SI 2002/2677.
Medical and occupational health records and medical examination certificates concerning exposure to asbestos	40 years from the date of the last register entry. Certificates: Date of issue plus 4 years.	The Control of Asbestos at Work Regulations 2002. Control of Asbestos Regulations 2006. Control of Asbestos Regulations 2012.
Register of employees exposed to airborne asbestos (including employee health records)	40 years from date of last register entry	Regulation 22(1) Control of Asbestos Regulations 2012, SI 2012/632.
Manufacturer documents re conformity assessment / statement of an energy-consuming product	10 years	Regulation 9, Eco-design for Energy-Related Products Regulations 2010/2617.
Technical specification documentation and performance declarations on construction products	10 years	Article 11 Regulation (EU) No 305/2011, laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/E.
Copy of documents re transfer of waste materials by the competent authority	3 years from transfer	Article 20 of the Regulation (EC) No 1013/2006 on Shipments of Waste.

Data on nature, quality and composition of waste and responsibilities of producer, holder or consignor of hazardous waste to retain records	length of time as holder of the waste and a further 3 years.	Regulation 49(3) Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Technical documentation on noise emissions	10 years	Regulation 7, Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001/1701. Directive 2000/14 of the European Parliament and of the Council of 8 May 2000 on approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors and EC-statement

G. Insurance Records

Type of Material	Minimum Retention Period	Reason
Insurance policy, proposal forms, renewal notices and certificates. purchase and sales ledger; employee expense records)	Until claims under the policy are barred, all outstanding claims are settled, the policyholder can no longer bring legal proceedings against the insurer or broker and, if legal proceedings have started, the appeals process has been exhausted. end of any tax enquiry, if longer.	Companies Act 1985 as amended by the Companies Acts 1989 & 2006. Generally Accepted Accounting Practice (UK GAAP).
Records relating to the suitability and appropriateness of an insurance-based investment product for the customer	You must keep records for at least 5 years or if necessary, for the length of the relationship between the insurance intermediary/insurance undertaking and the customer.	Financial Conduct Authority SYSC 9.1.2AR Article 19 (EU) 2017/2359 and, COBS 9A.4.3 and COBS 10A.7.2A.
Claim documents: records of incidents giving rise to a claim, claim correspondence and records of payouts	Until claims under the policy are barred, all outstanding claims are settled, the policyholder can no longer bring legal proceedings against the insurer or broker and, if legal	Company Policy

	proceedings are commenced, the appeals process has been exhausted.	
Records relating to Insurance Premium Tax (including policy documents, copies of invoices, credit or debit notes and business and accounting records)	For tax purposes, you must keep these records for a period of six years.	Regulation 16 of the Insurance Premium Tax Regulations 1994, SI 1994/1774.

H. Miscellaneous

Type of Material	Minimum Retention Period	Reason
Miscellaneous		
Confidentiality and non-competition agreements (if a penalty is attached to the non-competition or confidentiality clause)	For the length of the contract or agreement, but 6 years after the contract expires.	Section 5 Limitation Act 1980
Intellectual property records	The recommendation is to retain documents for the life of the intellectual property and 6 years after	Section 5 Limitation Act 1980
Complaints Process	6 years from the final recorded communication from the complainant about the complaint.	Required as part of the Limitation Act 1980
Whistleblowing Process	6 years from the final recorded communication from the person raising the issue about the case. Where a case is raised anonymously, 6 years from the date the case is concluded.	Required as part of the Limitation Act 1980

Data Protection Impact Assessments	6 years	Company Policy
Breach Reporting	3 years after the investigation and remedial action were completed.	Company Policy
DSARs Request	1 year after the DSAR is complete.	Company Policy
Finance Internal emails	Financial Year + 3 Months	Company Policy
Staff Mailboxes and Outlook(inbound and outbound emails)	5 years	Company Policy
Staff Mailboxes and Outlook(inbound and outbound emails)	Chat data is cleared every 90 days	Company Policy

End of Schedule

Data Retention Schedule – Updated January 2025