



Retention Policy

RECORD RETENTION GENERAL GUIDELINES:

HOW DO I KNOW IF I NEED TO RETAIN A RECORD?

Generally, it is desirable to dispose of unnecessary records as promptly as possible, unless required to be retained longer by this Retention Policy. If a retention period is not covered by the applicable retention schedules in the Retention Policy, follow the guiding principles of keeping fewer records and shorter retention periods ("Privacy by Default"). If you are not the person in charge of a record and you can answer "no" to all of these questions, then you should dispose of the record as soon as practicable after it has fulfilled your purpose:

- Does the record have real value as a basis for future decisions?
- Would it be difficult or expensive to reassemble the content of a still-needed document?
- Is the record evidence of a completed material business transaction?
- Does the record support legal action or provide additional information necessary to the complete understanding of a primary document?
- Is the record necessary for regulatory compliance, a threatened or pending government investigation or litigation or in order to comply with a legislative requirement?
- Is the record normally one requested by tax authorities? Does the document provide substantiation which could prevent the loss of tax deductions?
- Is the document necessary to comply with the requirements of government agencies or to conform to EU, Irish, and other requirements for reporting?
- Does the record or document provide important research data about [The Hotel] and its products?
- Does the document have a historical value, such as providing a unique reflection of significant trends in the development of [The Hotel]?

If the answer is "yes to any of the above questions, make sure that the original record is safe before you dispose of your copy.

RECORD RETENTION GENERAL GUIDELINES

DO

- Keep records active only if the retention schedule requires it. Otherwise, inactive records should be archived for the required retention period.
- Review active files at least once a year for disposal of records, or for archiving, as appropriate.
- Post a destruction date on records (or file folders) to facilitate annual file review.
- At least once annually dispose of unneeded copies of magazines, trade journals, articles and other publications of general circulation.
- If you are not the person in charge of the record, dispose of your copy when you are finished using them, unless they are needed for further reference.

- Dispose of duplicate paper copies of records or duplicates retained on disks, USB keys, or other electronic or digital media.
- Maintain the privacy and security of records at all times.
- Be sure to place records where they can be retrieved efficiently.
- Consult Colm Campbell - Privacy Compliance Co-ordinator on the retention of any records that you believe may not be covered by the Retention Policy that you believe should be retained for special or unforeseen circumstances (for example, potential litigation, investigation or business needs. The Riverbank House Hotel may update this Retention Policy to capture such previously uncaptured records in the policy.

- When disposing of any records in accordance with the Retention Policy, be sure to dispose of such records properly, in a manner that will not allow the records to be retrieved and reviewed by unauthorised persons.
- For records related to a continuous serial transaction or a continuous ongoing project, event or relationship, the applicable retention schedules for such records should be deemed to begin to run from the creation of the most recent such record created for such serial transaction or ongoing project, unless earlier related records no longer serve a business purpose. In any event, as with all records, each record created as part of a serial transaction or ongoing project should be retained for at least the period of time identified on the applicable retention schedule for that type of record.

- The Riverbank House Hotel may occasionally enter into confidentiality or other agreements with third parties that require The Riverbank House Hotel to return or dispose of confidential information provided by the third parties.

DO NOT

- Do not destroy any records required to be held by applicable legislation or where legal proceedings are apprehended or threatened until the required period or the threat of litigation has expired.
- Do not fail to produce or disclose any records, including e-mails or other electronic data, when required to be disclosed by court subpoena or discovery proceedings, or by a data subject data access request under the GDPR.
- Do not alter or dispose of any records, including e-mails or other electronic data, which have been required to be disclosed by court subpoena or discovery proceedings, or by a data subject access request under the GDPR.
- Except when such records are subject to potential or pending litigation or investigation, do not retain drafts, handwritten notes, calendars, planners, telephone logs or historical files maintained for your own personal use any longer than is reasonably needed.
- Do not dispose of records other than in compliance with this Retention Policy.
- Do not remove records from The Riverbank House Hotel locations for storage at home or any other non-company location.
- Do not allow access to private or confidential records (specifically including health, financial or other personal data) except to Riverbank House Hotel personnel and other authorised persons who you specifically know to have a right to such access.

RECORD CREATION GENERAL GUIDELINES

DO

- Make sure you are truthful and accurate in what you say
- Treat e-mails with the same level of care as other written records
- Follow The Riverbank House Hotel's policies in creating records
- Keep e-mail and voicemail messages short
- Make everything clear and unambiguous. A reader may not have a chance to ask for clarification
- Use concrete terms and facts objectively so that the reader will have a clearer idea of your meaning
- Consider the appropriateness of expressing information in person rather than in writing or by voicemail
- Proofread what you plan to send
- Be prepared to explain the implications of words used in e-mails and voicemails

DO NOT

- Do not include confidential information unless essential.
- Do not put something in a document that you would want to see printed on the front page of the newspaper, or have read in a courtroom.
- Do not be too informal or emotional - anything that you say in an e-mail or voicemail can easily be passed on to someone else
- Do not send a document when person-to-person communication serves your purposes better.
- Do not use insincere praise or make promises that cannot be honoured
- Do not act illegally or make statements that violate the law
- Do not overstate – a single overstatement can diminish your entire document
- Do not write false and malicious statements
- Do not create documents, especially e-mails, as a vehicle for “venting” about an issue.

GUIDELINES REGARDLING E-MAILS, INSTANT MESSAGING, TEXT MESSAGES AND OTHER ELECTRONIC RECORDS

“Records” include e-mails and other electronically and digitally stored information. This includes business-related information that may be stored in digital and electronic form. The below is a non-exhaustive list to illustrate the wide range of storage being discussed:

- Desktop personal computers
- CD's, Flash Drives, Zip disks and other portable drives
- Network drives
- Cloud based services
- Home computers
- Laptop computers
- Internet backup files
- Smart phones and tablets
- E-mail services
- Program files
- Hard drives
- Voicemail
- Digital cameras

- Backup tapes
- Central processing units (CPUs)

Because it is one of the primary means of communication in business, e-mail has great value. E-mail messages, however, often sent too hastily, without the level of thought and consideration that typically accompanies formal letters or memoranda. The Riverbank House Hotel's employees should avoid using e-mail to communicate partial thoughts, incomplete ideas or messages that may be ambiguous and that may be misinterpreted by a reader. E-mail is not conversation, and often will be read by others in addition to the original addressees. Person-to-person communication is recommended for "brainstorming" or "thinking-out-loud" sessions.

When responding to e-mails, try to avoid the "Reply All" tool, instead limiting your reply to only those who really need to receive it. Otherwise, a single "Reply All" message may create numerous unnecessary non-custodial records. In addition, careless use of the Reply All function can send an email to recipients who really should not be privy to your reply. Business records created, sent and received in electronic form (e-mails) should be printed and filed in the appropriate filing system just like any other business record and in accordance with the Retention Policy – this is particularly true of those in charge of original or primary records. Each employee has a responsibility to make sure that existing computer personal folders, whether in outlook and on your PC or file server, are reviewed and records deleted that have been superseded or are no longer required to be kept by the Retention Policy. Routine e-mails will be deleted [Insert agreed retention period] after they are last edited. This applies to e-mails in all folders within the mailbox, including, Outbox, Sent Items, Inbox and all sub-folders.

VOICEMAIL

All voicemail should be deleted after the message has been heard

RETENTION SCHEDULE SPECIFIC RECORDS

Record Type Category	Retention Period	Reason	Start of Retention	Period Notes
Books of Accounts	Varies, but generally 6 years.		Generally, date of creation of record.	Often held for 7 years
Payroll and salary records	Minimum 6 years or such shorter period as the Revenue Commissioners may authorise in writing		From the end of the year to which such records refer	Often held for 7 years
Working time records	3 years		From the date of the leave	Often held for 4 years
Parental leave/force majeure records	8 years		From the date of the leave	Often held for 9 years
Employee tax records	7 years		Termination of employment	Often held for 8 years
Employment contract	Duration of employment relationship + 6 years		Date of termination	Often held for 7 years
Record of ID documents of employees. Do not keep copies of passports or driving licences. If required, the last four digits of such documents can be recorded, once the Hotel has seen the original and satisfied themselves as to the ID	Duration of employment Relationship + 1 year		Date of termination	Often held for 2 years

of the employee				
Data documents concerning pension schemes	Permanently			
Data of rejected job applicants.	1 year		From date of interview/application	Often held for 2 years.
Reports on employee performance review meetings & assessment interviews (e.g. evaluations, employment application forms of successful applicants, copies of academic and other training received, employment contracts and their amendments, correspondence concerning appointment, appraisals, promotions and demotions, agreements concerning activities in relation to the works council, references and sick leave records)	6 years		From date of creation	
List of employees who have worked under dangerous conditions or whose health has otherwise been under threat	Varies: for as long as issue remains. If no issue, hold for no longer than 1 year after employment ends, unless litigation apprehended or threatened		From cessation of issue	
Accident reports	10 years.		From the date of the accident or dangerous occurrence	
General ledger, accounts receivable department, accounts payable department, (procurement and) sales administration, inventory records	6 years			
Contract – records relevant to the defence of any proceedings in contract	As the proceedings must be issued within 6 years, and service may not follow for up to 1 further year, retention for seven years suggested or 13 years where contracts are executed under seal		Last action taken under contract	
CCTV	1 month		From date of capture	We understand from the IHF recommendation due to the current environment of insurance claims, it is an industry norm for hotels to retaining CCTV footage for over 1 month based on legitimate business interest
Local Drives:		Local drives should not have personal data kept on them. It is bad governance. If personal data is stored on them, then they		Items in local drives should not be archived. Local drives should only be used for local programs and apps.

		should be archived/deleted in the same way as server side information		
Emails		Unless specifically saved to a folder – six months		Archive after six months.
Subject Access Requests	6 years		Access request	To show access request has been met.
HR data other than leave or Pension Documents	Until no longer Operationally necessary / until termination of employment		1-year post archiving / post termination, whichever is the earlier.	
HR data on pension or leave	Until no longer Operationally necessary / until termination of employment		6 years post termination	
Details of unsuccessful candidates	1 year.		Archive once outcome of candidature is known	
Electronic marketing data – noncustomers	1 year		Last point of contact provided target individual originally consented to receiving marketing data	
Electronic marketing data – customers	1 year		From last point of contact with customer	Customers do not need to consent to receive marketing data
Booking data, check-in data, special requests data	For as long as the guest remains a customer			A customer relationship is generally considered terminated from a data protection viewpoint if a transaction has not occurred within the previous year.
Financial data and credit card information	For as long as it is necessary to process the transaction, including any queries which may arise.			
Loyalty scheme information	For as long as the guest is an active participant in the loyalty scheme.			Non—use of the scheme for a year or more, would indicate cessation
Contact information of guest.	As long as the guest remains a customer.		Typically one year from the last transaction	
Information provided via tour operators and other 3rd parties. (guest lists etc).	One year from the date of visit.			
Details of current registration number, details of driving licence, details of passport	One year from the date of visit.			
Hotel register data.	One year from the date of visit.			

Request to place a HOLD on documents

[Note – If sent via e-mail add the following header: ACKNOWLEDGE YOUR RECEIPT AND COMPLIANCE WITH THIS REQUEST BY RETURN
RE: **HOLD ON RECORDS**

In connection with _____.

UNTIL FURTHER NOTICE [OR UNTIL INSERT TIME], NORMAL OPERATION OF THE RETENTION POLICY IS SUSPENDED. PRESERVE ALL DOCUMENTS WHICH PERTAIN TO OUR DEALINGS WITH AND CONCERNING _____ UNTIL _____ [INSERT TIME PERIOD].

“Documents” means all records in whatever form, whether internal or with other parties, including e-mails, electronic documents on any devices at work and at home, financial records, correspondence, notes, reports, drafts, telephone logs, calendars, presentations, and a wide range of other records, in whatever form, hardcopy or electronic, whether existing or yet to be created.

PRESERVE FROM AUTOMATIC DELETION AND TO NOT DELETE any e-mail or documents howsoever stored, that relate in any manner to the matter set out above until further notice from **Colm Campbell (Privacy Co-Ordinator)**.

Please use the following checklist as a guide when searching for Documents subject to this Hold Request:

- Home Files
- Desktop/ Desk Drawers
- File cabinets
- Computer hard drive (desktop and/or laptop)
- Smart Phone, Tablets, or other devices
- Computer USBs, CDs, or DVDs or other media)
- Materials stored on [The Hotel’s] servers or on the internet, including other email accounts
- Briefcase
- Notebooks/Appointment Books (including Outlook)*
- Voicemail, Tape or Video Recordings*
- Any other location that may contain responsive information

Please seek assistance if you have Documents in these unusual formats and require assistance in preserving them.

End.

RIVERBANK
HOUSE HOTEL