



Data Retention Policy

Beech Web Services Ltd Version: 2.0 **Date:** 02 April 2026 **Next review:** 02 April 2027 **Policy owner:** Roz Healey, Director

1. Purpose

1.1 This policy sets out how Beech Web Services Limited collects, holds, and disposes of personal and business data. It applies to all data held by the company, in any format, and to all staff, virtual workers, contractors, and third parties acting on behalf of Beech.

1.2 Beech is committed to handling data responsibly, retaining it only for as long as is necessary for the purpose for which it was collected, and disposing of it securely. This policy supports compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.3 As a B Corp organisation, Beech holds itself to a high standard of accountability in the handling of personal data, recognising that responsible data stewardship is part of our broader commitment to operating ethically and transparently.

2. Scope

2.1 This policy applies to all personal and business data processed by Beech, including:

(a) Client data and client project files (b) Data held on behalf of clients as a data processor (including end-user data submitted via client websites) (c) Employee and virtual worker/subcontractor data (d) Financial and accounting records (e) Website analytics data (f) Email correspondence (g) Marketing and sales data (h) Supplier and third-party processor data

2.2 Where Beech acts as a data processor on behalf of a client (for example, where personal data is stored within a client-hosted website via contact forms, enquiry forms, or ecommerce transactions), Beech will handle that data in accordance with the client's instructions and any applicable data processing agreement. Clients are advised to conduct regular housekeeping of data stored within their websites and to establish their own retention practices.

2.3 This document was last updated on 02 April 2026.





3. Responsibilities

3.1 Roz Healey, Director, is the designated data protection lead and holds overall responsibility for implementing and maintaining this policy. This includes:

(a) Ensuring all staff and virtual workers understand and follow retention requirements (b) Conducting an annual review of this policy (c) Overseeing the secure disposal of data at the end of its retention period (d) Responding to data subject access requests in line with UK GDPR obligations (e) Maintaining the internal data processing register

3.2 In the absence of Roz Healey, responsibility passes to Sophy Bostock, Development Manager, who acts as the secondary data protection lead.

3.3 Beech has assessed its processing activities and determined that it is not required to appoint a formal Data Protection Officer under UK GDPR. This assessment will be reviewed annually as part of the policy review process.

4. Default Retention Period

4.1 The default retention period for all data held by Beech Web Services is two years from the date of last activity, contact, or creation, whichever is most recent.

4.2 This default period is based on the legitimate interest of retaining data for a reasonable window to address potential disputes, support client re-engagement, and ensure continuity of service. Where the default period is applied, Beech has determined that retention beyond two years would not be proportionate to the purpose for which the data was collected, in accordance with the data minimisation and storage limitation principles of UK GDPR Article 5(1)(e).

4.3 Data falling outside the specific categories listed in Section 5 will be retained for two years and then securely deleted or anonymised in accordance with Section 6.

5. Retention Schedule

5.1 The following categories of data have legally or operationally mandated retention periods that override the two-year default.





Data category	Retention period	Basis/notes
Financial and accounting records	6 years from the end of the relevant financial year	HMRC requirement under the Companies Act 2006 and Taxes Management Act 1970
Employee records (active employees)	Duration of employment plus 6 years	Limitation Act 1980. Covers contracts, payroll, performance, and disciplinary records
Employee records (former employees)	6 years from end of employment	Covers tax records, pension information, and claims-related data
Payroll records	6 years from end of relevant tax year	Aligned with HMRC best practice and financial records retention
Virtual worker and subcontractor records	6 years from end of engagement	Covers agreements, payment records, and communications. Consistent with Limitation Act 1980
Client contracts and agreements	6 years from end of contract	Limitation Act 1980. Covers signed agreements and statements of work
Client project files and correspondence	6 years from end of project or last activity	Retained to cover the full limitation period for potential contract disputes or IP queries
Data held as processor for clients (e.g.	Per client instruction or, in absence of instruction, 2 years	Clients are data controllers for this data. Beech retains only as directed





website form
 submissions)

Website analytics data	For the duration of the active client relationship, plus 90 days following termination of that relationship, after which data is anonymised or deleted	Anonymised where technically possible
Marketing email data (B2B contacts)	Until unsubscribe request or 3 years from last meaningful engagement	Contacts are treated as business contacts operating in a commercial capacity. Retention based on legitimate interests under PECR and UK GDPR
Marketing email data (B2C or individual contacts)	Until unsubscribe request or 2 years of inactivity	UK GDPR lawful basis: consent. Consent records retained for 3 years from date of collection
Recruitment data (unsuccessful candidates)	6 months from notification of outcome	UK GDPR best practice to minimise data held
Incident and complaint records	3 years from date of record	To support potential litigation or regulatory enquiry
Supplier and third-party processor data	6 years from end of relationship	Covers contracts, DPAs, and correspondence



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Special category data (UK staff only)	Duration of employment plus 6 years, unless a shorter period is required by law	Handled with additional security measures and access restrictions
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6. Data Disposal

6.1 At the end of the applicable retention period, data will be disposed of securely. The method of disposal depends on the format:

(a) Digital files: permanent deletion using secure deletion processes, or verified removal from cloud storage platforms (b) Email correspondence: deleted from all mail servers and backup systems (c) Physical documents: cross-cut shredding or use of a certified confidential waste contractor

6.2 Beech uses a structured offboarding and archiving process for data disposal. When data reaches the end of its active use, it is moved to a designated archive. Data within the archive is subject to category-appropriate retention periods as set out in Section 5. Where different categories of data have different retention periods, files are archived in separate folders corresponding to each category to ensure the correct deletion timeline is applied to each.

6.3 A data disposal log is maintained by the policy owner. For each disposal event, the log records:

(a) The category of data disposed of (b) The date of disposal (c) The method of disposal used (d) The name of the person who carried out or verified the disposal

6.4 The disposal log is itself retained for 3 years from the date of the most recent entry.

7. Data Storage and Security

7.1 All data held by Beech is stored securely. Digital data is held on systems protected by strong authentication controls, with access restricted to authorised personnel on a need-to-know basis.

7.2 Beech applies the following minimum security standards to all personal data it holds or processes:





(a) Encryption in transit for all data transferred over networks (b) Encryption at rest for all data held in cloud-based systems, where the platform supports it (c) Access controls limiting data access to individuals with a defined operational need (d) Antivirus and anti-malware protection required on all devices used to access company systems, including those used by virtual workers

7.3 Where data is held or processed by third-party processors (including cloud storage providers, accounting software, CRM systems, email marketing platforms, and project management tools), Beech ensures that:

(a) Each processor is subject to a written data processing agreement setting out their obligations under UK GDPR (b) Processors are assessed for appropriate security standards before engagement (c) An internal register of current processors is maintained and reviewed annually by the policy owner

7.4 Beech engages virtual workers based outside the United Kingdom. The transfer of personal data to those workers is subject to appropriate safeguards as required by UK GDPR Article 46. Where workers are based in countries not covered by a UK adequacy decision, transfers are made under a UK International Data Transfer Agreement (IDTA) or equivalent approved mechanism. Virtual workers are contractually required to maintain antivirus and anti-malware protection on their devices and to notify Beech immediately if they become aware of any security breach or suspected compromise.

8. Data Subject Rights

8.1 Individuals whose data Beech holds have the following rights under UK GDPR:

(a) The right to access their personal data (subject access request) (b) The right to have inaccurate data corrected (c) The right to request deletion of their data (right to erasure), where applicable (d) The right to object to processing (e) The right to restrict processing in certain circumstances (f) The right to data portability, where processing is based on consent or contract and carried out by automated means (g) The right to withdraw consent at any time, where consent is the lawful basis for processing, without affecting the lawfulness of processing carried out prior to withdrawal

8.2 Requests should be directed to the data protection lead at Beech Web Services using the contact details published on our website. All requests will be responded to within one calendar month of receipt. Where a request is complex or involves a large volume of data, this period may



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be extended by a further two months, in which case the individual will be informed within the first month.

8.3 Beech will not charge a fee for handling data subject requests in ordinary circumstances. Where a request is manifestly unfounded or excessive, a reasonable fee may be applied or the request refused, with reasons given.

9. Breach and Incident Response

9.1 Any actual or suspected personal data breach must be reported immediately to the data protection lead. Beech will assess whether the breach is notifiable to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it, as required by UK GDPR Article 33.

9.2 Where a breach is likely to result in a high risk to the rights and freedoms of individuals, affected data subjects will be notified without undue delay.

9.3 All breaches, whether notifiable or not, will be recorded in the incident log maintained by the policy owner.

10. Policy Review

10.1 This policy will be reviewed annually from the date of last review, or earlier where there are changes in legislation, business activities, regulatory guidance, or data processing practices.

10.2 The policy owner is responsible for initiating and completing each review. Where material changes are made, updated versions will be communicated to all staff and virtual workers.



Signed:

Print Name: Roz Healey, Director, Beech Web Services Ltd

Date: 02 April 2026

Date for next review: 02 April 2027



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