

## Revolve Collective – Data Retention Policy

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<b>OWNER / AUTHOR</b>	Interim DPO
<b>APPROVED BY</b>	Sara Taylor, Director   Revolve Collective

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### 1. Purpose

This policy outlines how Revolve Collective stores, manages, and disposes of personal and organisational data. It ensures we uphold the principles of data protection, comply with legal and regulatory requirements, and maintain transparency with those whose data we process.

### 2. Scope

This policy applies to all personal and sensitive data held by Revolve Collective, including but not limited to:

- Employees
- Agency workers and candidates
- Clients and partner organisations
- Volunteers and beneficiaries
- Website users and marketing contacts
- Financial and safeguarding records

### 3. Legal and Regulatory Context

Revolve Collective is committed to compliance with all applicable data protection legislation, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Limitation Act 1980
- Companies Act 2006

- Safeguarding Vulnerable Groups Act 2006
- Keeping Children Safe in Education (KCSIE) statutory guidance

#### **4. Retention Principles**

We only retain personal data for as long as is necessary to fulfil the purpose it was collected for, including for the purposes of satisfying legal, contractual, or safeguarding requirements.

Where legal retention periods are stipulated, we comply fully. In all other cases, our retention is guided by best practice and internal policy. Full retention periods by data type are detailed in our [Data Retention Schedule].

#### **5. Storage and Security**

All data is securely stored:

- Digitally in encrypted systems and secure cloud environments
- Physically in locked cabinets or restricted office areas

Only authorised personnel have access to personal or sensitive data, and all staff undergo data protection training.

#### **6. Disposal of Data**

When data is no longer required, it is securely destroyed:

- Digital files are permanently deleted and removed from backup systems
- Physical records are cross-shredded or destroyed via approved providers

#### **7. Individual Rights and Requests**

Individuals may exercise their rights under data protection law, including the right to request deletion of data. However, data may be retained where required by law or safeguarding obligations.

#### **8. Data Categories and Retention Periods**

Our retention schedule covers:

- Organisational records (e.g. policies, reports, insurance)
- Employee and HR records (e.g. references, DBS, health, compliance)
- Candidate and worker records (e.g. payroll, vetting, attendance)
- Finance and audit data (e.g. donations, profit share, tax)
- Marketing and communications data (e.g. consents, preferences)
- Safeguarding, risk, health and safety, complaints
- Communications (e.g. WhatsApp groups, emails, internal chat logs)

See accompanying Data Retention Schedule for full breakdown.

## 9. Review and Monitoring

This policy and the retention schedule are reviewed annually or in response to legal changes.

## 10. Contact and Oversight

For queries regarding this policy or individual data rights, please contact:  
[privacy@revolvecollective.org](mailto:privacy@revolvecollective.org)

**Last updated:** June 2025

**Next review due:** May 2026

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This policy is part of our wider commitment to handling data with integrity, safeguarding individuals, and promoting trust in how we operate.

