



**RETENTION (OF DATA)
POLICY**

This Retention Policy forms part of Stone Rowe Brewer's overall Data Protection and Information Management and Security Policy as embedded in the Firm's Quality Procedures Manual and it should be read and considered in that context. This Policy has been revised by reference to the GDPR as introduced on 18th May 2018 and will be reviewed periodically hereinafter

<p>General Policy</p> <p>Considerations</p>	<p>The Firm's general policy as to retention of data is that data will not be retained beyond the time when it is necessary to do so.</p> <p>Unless a client specifically requests the erasure of data or requests to be forgotten, the following considerations will be taken into account:</p> <ul style="list-style-type: none">• Case documents may be relevant to an appeal out of time.• File documents can be used as precedents.• Data on file is specifically retained for legal purposes only• Data and documents are of significant value and benefit to the data subject within subsequent matters, cases and transactions• Case documents may contain the results of research into the law, which
---	--

<p>Considerations (continued)</p>	<p>may be relevant to a current case.</p> <ul style="list-style-type: none">• Instructions, facts or expert opinions in a previous case may be relevant to a current case.• Correspondence or instructions contain contact details which may be useful.• File documents or records may be important when carrying out a conflict search.• Case documents have to be retained in the event that a complaint is made against a solicitor, or a solicitor makes a claim against his or her insurers.• In the context of a law firm, experience identifies that most clients prefer the retention of their data to provide a smooth transition between one matter and another-for example, clients' Wills or copies of their Wills are stored indefinitely
<p>Storage Policy</p>	<p>The Firm's policy as to storing data securely includes:</p> <ul style="list-style-type: none">• In cases when data is stored on printed paper, it should be filed promptly and kept in a secure place where unauthorised personnel cannot access it• Printed data should be shredded when it is no longer needed• Data stored on a computer should be protected by strong passwords• Data is not generally stored on CDs or memory sticks but if it is then they should be locked away securely when they are not being used• The DPO must approve any cloud used to store data• Our servers containing personal data are kept in a secure location, away from general office space

<p>Storage Policy (continued)</p>	<ul style="list-style-type: none">• Data should be regularly backed up in line with the Firm's backup procedures• Data should never be saved directly to mobile devices such as laptops, tablets or smartphones• All servers containing sensitive data must be approved and protected by security software and a strong firewall• At the conclusion of files/matters, the Firm's archiving policy is to store information securely on its intranet and in that regard such information and data is encrypted.
<p>Duties as a Law Firm</p>	<p>We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained. As a Law Firm, we have duties to retain data for a period of 6 years and in various types of transactions, such as personal injury or clinical negligence cases involving children or in family or matrimonial matters, the retention period may be longer of necessity.</p>
<p>Special Category Data</p>	<p>The Firm's policy is that, except in certain circumstances, special category data will be deleted and/or destroyed at the point of archiving the data subject's file or matter after the conclusion of the transaction in question. Examples of the certain circumstances when special category data may be retained for longer are:</p> <ul style="list-style-type: none">• In litigation matters where an appeal out of time may be a possibility• In legal matters relating to children where it may be necessary to re-open or re-visit the matter at a later date• In Trust or tax matters

