

## THE PARTNERSHIP LIMITED DATA RETENTION POLICY

The need to retain data varies widely with the type of data and the purpose for which it was collected. The Partnership 2009 Limited strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required. This policy sets forth The Partnership 2009 Limited's guidelines on data retention and is to be consistently applied throughout the organization.

### Scope

This policy covers all data collected by The Partnership 2009 Limited and stored on The Partnership 2009 Limited's owned or leased systems and media, regardless of location. It applies to both data collected and held electronically (including photographs, video and audio recordings) and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by federal or local law, federal regulations and legitimate business purposes, as well as the EU General Data Protection Regulation (GDPR).

### Reasons for Data Retention

The Partnership 2009 Limited retains only that data that is necessary to effectively conduct its program activities, fulfil its mission and comply with applicable laws and regulations.

Reasons for data retention include:

- Providing an ongoing service to the data subject (e.g. conducting legal work for a relevant Conveyancing transaction or processing of employee payroll and other benefits)
- Compliance with applicable laws and regulations associated with legal requirements.
- Other regulatory requirements

### Data Duplication

The Partnership 2009 Limited seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other business reasons it is necessary for data to be held in more than one place. This policy applies to all data in The Partnership 2009 Limited's possession, including duplicate copies of data.

### Retention Requirements

The Partnership 2009 Limited has set the following guidelines for retaining all personal data as defined in The Partnership 2009 Limited's data Privacy Notice.

- Client data will be held for the duration of the transaction and then stored for a remaining 6 years for a Sale and 15 years for a Purchase and any remaining transaction types. This is in line with our regulatory requirements.
- Employee data will be held for the duration of employment and then destroyed after the last day of employment.

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- Data associated with employee wages, leave and pension shall be held for the period of employment.
- Recruitment data, including interview notes of unsuccessful applicants, will be held for six months after the closing of the position recruitment process.
- Data associated with tax payments (including payroll, corporate and VAT) will be held for five years.

### **Data Destruction**

Data destruction ensures that The Partnership 2009 Limited manages the data it controls and processes it in an efficient and responsible manner. When the retention period for the data as outlined above expires, The Partnership 2009 Limited will actively destroy the data covered by this policy.

If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, he or she should identify this data to his/her supervisor and provide information as to why the data should not be destroyed.

Any exceptions to this data retention policy must be approved by The Partnership 2009 Limited's Head of Data Privacy.

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