

Pro Centre | Retention Policy

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1. Our commitment

At Pro Centre Ltd, we are committed to protecting the data and privacy of our customers by upholding the rules surrounding Data Protection and GDPR. We offer assurance to our customers that we will only collect and retain data for a legitimate purpose.

The policy sets out how long we will keep the data we have collected and the reasons why. This applies to all:

- Data collected and stored digitally/electronically
- Hard copy documents
- Soft copy documents
- Communications including emails and telephone calls

If you are unhappy in how your data is being stored please let us know. We will take all reasonable steps to ensure your complaint is dealt with efficiently and fairly.

If you remain dissatisfied, you have the right to complain directly to the Information Commissioners Office (ICO) who can be contacted as follows:

Write to: **Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF**
Email: www.ico.org.uk

2. Who we are

Pro Centre Ltd is a photographic rental and retail company
We are a registered company in England & Wales with Registration No: 8922328 at:

**E3 The Premier Centre
Abbey Park
Romsey
SO51 9DG**

Data Protection registration number is ZA115645

The term 'Pro Centre Ltd' or 'us' or 'we' refers to Pro Centre Ltd as the owner of the website. The term 'you' refers to the user or viewer of our website.

If you have any questions about the personal data we hold for you, or want more details on how we use your information, you can contact us on +44 (0) 207 729 8822 or email info@procentre.co.uk.

3. Retention rules

Pro Centre Ltd will only retain data for as long as required for a period that complies with legislative and regulatory requirements, or to achieve a business purpose. Where there is no legislative or regulatory requirement or business purpose, we will retain data for a **minimum period of 30 days**. *The Data Retention Schedule for customers (Section 8)* outlines what data we store, why we retain the data, and the period we will retain the data.

Pro Centre Ltd fully complies with a Data Subject's rights in line with the GDPR. When a Data Subject lawfully requests to withdraw their consent, or invokes the right to be forgotten, we will take all necessary steps required to comply with the request within a prescribed time. We will inform you once your request has been fulfilled whereupon this will be our last correspondence with you.

Please be aware that we may be unable to permanently delete or destroy the data following a request if there is a legal or regulatory requirement to retain the data. We will inform you of these reasons whilst processing your request.

4. Safeguarding data during retention

We are committed to safeguarding and will take all reasonable technical and organisational precautions to prevent the loss, misuse, alteration, or exposure of your personal information. To provide our services, Enable Ltd collects and retains data in various ways and we have several safeguarding measures in place to ensure all data is safeguarded effectively.

Electronic data

Data that is retained electronically and digitally (including any soft copy document) is stored on secure servers (including back-up servers) in a secure facility. Our servers are password protected, firewall protected, and our back-up servers are also encrypted.

Physical data

Data that is retained physically (hard copies) is only stored as a matter of necessity. Pro Centre Ltd operates a strict Clear Desk policy that ensures all staff retaining documents containing personal data is stored in a locked facility whilst not in use. Any documents containing personal data that need to be stored physically for business or legislative purposes are only stored for a temporary period and will be filed digitally as quickly as possible and all hard copies securely destroyed.

Data exchanged via email

While we cannot take responsibility for the security of the internet, we do have in place security measures to safeguard sensitive information being sent via electronic mail. No personal details other than using a customer's name as a salutation (and our service identifier code, if applicable) will be included in the main body of our emails.

If you are in receipt of an email that you become aware was not intended for you, you have a responsibility to notify the sender and delete the errant email immediately.

Data exchanged by telephone

Customers telephoning us will be asked to confirm their identity by answering selected security questions before our advisors will discuss details of their account. If you have nominated someone to liaise with us on your behalf we will require your express written authorisation to discuss your account with that person. We have a strict policy not to discuss any account or disclose any details to any caller who:

- a) Has not been satisfactorily identified as the account holder
- b) We have not been given express written authorisation to discuss the account with

This includes any of employees of our customers.

5. Disposal and destruction of data

Where data has been stored for the required period and/or is no longer required for a lawful business purpose or legal requirements it will be erased or physically destroyed in a secure environment to prevent any recovery of the data.

Disposal of electronic data

Pro Centre Ltd routinely reviews all data held electronically or physically to decide whether to data processed has been held for the maximum time required for its purpose. When the data in question is no longer required to be retained it will be deleted from our systems (including both original files and back-ups, electronic and physical).

Disposal of physical data

Disposal of physical documents containing personal data is shredded.

Disposal of other data

Disposal of other data (such as recorded telephone calls) are automatically deleted from all our servers after the required retention period outlined in the retention schedule below (section 8.) If you request to right to be forgotten, we can remove all phone calls associated with your telephone number manually from our phone server.

6. Associated documents

- Privacy Policy
- Website Policy
- Subject Access Request Policy
- Service Terms & Conditions and/or Service Level Agreement (where applicable)

7. Acceptance

This Data Retention Policy was last updated in April 2018.

By using our services, you agree your personal data and information being retained as set out in this Data Retention Policy and as detailed in the *Data Retention Schedule* (see section 8). Any updates to our Data Retention Policy will be made available on our websites and in our Members Areas.

Please share any questions, concerns or comments you have about this policy by writing to:

The Managing Director
Pro Centre Ltd
14 Union Walk
London E2 8HP

or email info@procentre.co.uk

8. Data Retention Schedule for customers

Customer Relationship Management

Data	Why we retain	Retention period
CRM Data including name, address, all contact details, service agreements, payment records	To provide the service the customer has chosen	Duration of the customer's subscription to our services. Some records will be retained once your subscription with us has finished for the duration that is required, depending on the service the customer has chosen. See Below

Accounts & Finance

Data	Why we retain	Retention period
Direct Debit mandates/ customer bank details	For reference in case of investigation	7 Years
Purchase ledger invoices	Audit requirement	7 Years
Bank documentation, including refunds	Audit requirement	7 Years
Credit & debit card details/card payment receipts	To keep as reference regarding customer queries	1 month/7 years

Marketing & Websites

Data	Why we retain	Retention period
Google Analytics data, including but not limited to website users' <ul style="list-style-type: none">– Location– IP address– Website user behaviour	To measure the performance and activity of our websites to make informed marketing decisions	50 months
Client Marketing preferences	To ensure that we respect your choice regarding if/how you would like to receive marketing material	Permanent unless informed otherwise by customer

Third Parties & Suppliers

Pro Centre Ltd may work with or employ the services of selected external companies to provide a business function. We treat the data of any external company or organisation as we would of any of our customers.

Data	Why we retain	Retention period
CRM Data including main contact name, business name, address, all contact details	To manage the relationship, request services, and/or deliver a service	Duration of the relationship between us and the third party
Any agreements or contracts including but not limited to: <ul style="list-style-type: none">– Service Level– Non-Disclosure	As a record of our contract and to manage the relationship Audit requirement	7 years or duration of the relationship
Invoice, payment details	For accounting purposes	7 years

Non-Customer Data

Data	Why we retain	Retention period
Recorded Telephone calls	Customer calls may be referenced for training and quality purposes	1 year
Emails	As a record of activity and correspondence, for reference	As required for the purpose of conducting the necessary business