

# Data Retention Policy



**TATA** CHEMICALS EUROPE

# Data Retention Policy

## TATA Chemicals Europe Limited (the Company): Data Retention Policy

### 1 Interpretation

- 1.1 The definitions provided in the Company's Data Protection Policy apply equally to this Data Retention Policy.

### 2 About this Policy

- 2.1 The Company is responsible for Processing Personal Data lawfully and recognises that such data can become out of date, inaccurate or unnecessary. The Company therefore recognises the need to have in place a robust process for managing, updating and maintaining the Personal Data it Processes.
- 2.2 This Policy sets out the Company's approach to the accuracy and retention of Personal Data and should be read in conjunction with the Company's Data Protection Policy and other Privacy Policies.
- 2.3 All Personnel must read, understand and comply with this Data Retention Policy. Company directors and managers have a specific responsibility to ensure that all Personnel they have responsibility for perform their role in accordance with the terms of this Data Retention Policy.
- 2.4 Any breach of this Data Protection Policy or other Privacy Policy may result in disciplinary action.
- 2.5 This Policy does not form part of any contract between the Company and any Personnel or the Company and any other third party (including clients or customers).

### 3 Data Minimisation

- 3.1 Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- 3.2 Personnel may only collect and use Personal Data as required for the purposes of job duties and must not collect excessive data. Personnel must ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised in accordance with this Data Retention Policy.

### 4 Accuracy of Personal Data

- 4.1 Personal Data collected, held or otherwise Processed by the Company must be accurate.
- 4.2 The accuracy of the Personal Data must be verified by Personnel on collection and at regular intervals in accordance with the relevant retention protocols. If any inaccuracies or omissions are identified, Personnel must take rectifying action.
- 4.3 Personnel are specifically responsible for maintaining the accuracy of any Personal Data:
- 4.3.1 stored on their own desktop or personal area of the Company's network;
  - 4.3.2 held in the Company's systems in relation to their own business contacts.



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- 4.4 Personnel are also responsible for ensuring the accuracy of their own Personal Data and are required to check their own personnel records at least once in every 12 month period to ensure that the information the Company holds is accurate and up to date. Personnel should notify the HR Department of any updates required.

## 5 Retention and Deletion

- 5.1 Personal Data must be retained for no longer than is necessary for the particular purpose for which it was originally collected.
- 5.2 The protocols recommend the periods after which Personal Data should normally be anonymised, deleted or destroyed. Exceptions to the protocols must be approved by the DPM. Any doubt about the applicable verification or retention period should be referred to the DPM.
- 5.3 Personnel should anonymise, securely delete or destroy Personal Data no longer needed in accordance with this Policy. Personnel should seek the assistance of the Company's IT Department in relation to the deletion, destruction or other treatment of Personal Data.

## 6 Changes to this Policy

The Company reserves the right to change this Data Retention Policy at any time without notice and, in particular, the Company may vary the categories of data and periods of time referred to in the protocols. Personnel are required to ensure that their knowledge of this Data Retention Policy is up to date and that they comply with its terms.

