

Document	Option Software Data Retention Policy
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About This Policy

This data retention policy is intended to be read in addition to the Option Software processing policy/agreement.

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Attributions

1. ICO Information Commissioner's Office

1. Definitions and Interpretation

Unless otherwise defined herein, capitalised terms and expressions used in this Agreement shall have the following meanings:

Option Software

The company acting as the Data Processor.

The Client

The company or Individual who signs up to use Option Software's services.

Unless specified otherwise, any references to The Client will refer to:

- *Existing Customers*
- *Past Customers*
- *Potential Customers*

Client Authorised Users

These are the people have been granted access to our products/services by The Client.

They are also going to be one of the Data Subjects, as they will most likely be employees of The Client.

Option Software Services

Option Software provides OneBoxBM as a service (typically called SaaS), this means we deliver applications over the Internet; software as a service.

Subscribers do not have to install any software or update any software Option Software manage everything for you from providing access to the application, security, maintenance, and performance.

2. Introduction

The Option Software's data retention policy is built around the following:

- The requirement be compliant with GDPR
- The rules and requirements set out by the HMRC
- Our duty to provide the products/services that our clients have signed up for
- Our legitimate business interests

3. GDPR

In order to comply with GDPR regulations:

- You must not keep personal data for longer than you need it.
- You need to think about – and be able to justify – how long you keep personal data.
 - This will depend on your purposes for holding the data.
- You need a policy setting standard retention periods wherever possible, to comply with documentation requirements.
- You should also periodically review the data you hold, and erase or anonymize it when you no longer need it.
- You must carefully consider any challenges to your retention of data.
- Individuals have a right to erasure if you no longer need the data.
- You can keep personal data for longer if you are only keeping it for public interest archiving, scientific or historical research, or statistical purposes.

Further information and clarification on the above points can be found at the following link.

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/storage-limitation/#retention_policy

4. HMRC

Option Software is required to keep certain documents by the HMRC, in failing to keep such records we would be breaking the law.

The list of records we are required to keep includes:

- Invoices
- Credit Notes
- Details of money paid into the business
- Details of money paid out of the business

As these records are required by law, they do not fall under the right to erasure granted by the GDPR regulation.

5. Our Products/Services

The day-day processing/management of The Client Data Subjects data is handled by The Client and its Authorised Users; *you can find further details in the Option Software Processing Policy/Agreement.*

Therefore, the responsibility for maintaining GDPR compliance, in this case, falls to The Client and Its Authorised Users.

The systems provided by Option Software keep an audit/history log of any changes made by The Client and its Authorised users, this means there will be traces of any data that they have deleted.

Given the nature/purposed of said log, such data being retained can be considered as being in the legitimate interests of The Clients business.

Should The Client no longer wish to use the products/services provided by Option Software to process and retain this data they can request that their contract be terminated and said data deleted/destroyed.

6. Backups

In order to protect both the interests of Option Software and our clients, our systems are designed to take backups of the data processed/stored by our systems.

As these backups are intended to be a snapshot of the data in our systems at a particular point in time, it's highly likely that the data contained within them will be different to the data presently stored within our systems; *the purpose of a backup is to allow us to restore data to a previous state.*

Given both the intended nature of the backups and technical limitations in place these backups will inevitably contain data that we have been requested to erase/destroy. At Option Software we do however systems in place that will periodically clean up the backups and remove any that are no longer needed; *see the Data Retention Schedule.*

6.1. Automated Backups

Automated backups are taken at regular intervals using a scheduled process; *said process both encrypts the backups and places them in password protected folder prior to sending it up to the cloud.*

Alongside the automated backups we also run an automated clean up process, that will delete any backups over a certain age; *see section 7. Data Retention Schedule*

6.2. Manual Backups

At times individuals at Option Software will take manual backups of the data within our clients systems; *said backups are both encrypted and password protected and may or may not be stored in the cloud.*

Backups taken in this manner are intended to be kept until they have fulfilled their purpose and are not clean up as part of an automated process.

7. Data Retention Schedule

The following table provides details of the retention periods for the various data within the Option Software systems.

Clients (Paid Subscription)		
Description	Details/Notes	Retention Period
The Client		
The following data is either kept about or in relation to The Client.		6 Years after Option Software Accounting Year End. <i>Following customer account closure.</i>
Client Details	<ul style="list-style-type: none"> The name of the company or the trade name of the individual Their personal details Their contact details Their billing details 	
Accounting	<ul style="list-style-type: none"> Any Invoices sent to The Client Any Credit Notes sent to The Client Details of payments made from The Client to Option Software Details of payments from Option Software to The Client 	
Communication between The Client and Option Software	<ul style="list-style-type: none"> Emails Records of Phone/Mobile Phone calls Using the contact form Using the support system 	
Legal and Regulatory	<ul style="list-style-type: none"> Details contained in any legal documents Details contained any documents relating to the collection of Debt Details contained within documents used to maintain compliance with any relevant UK Law or regulatory body (The HMRC etc). Details contained within documents used to maintain compliance with data protection law. 	
Client Authorised Personal		
The following data is either kept about or in relation to The Client Authorised Personal.		6 Years after Option Software Accounting Year End. <i>Following customer account closure.</i>
Personal Details	<ul style="list-style-type: none"> Their personal details Their contact details 	
Communication between The Authorised User and Option Software	<ul style="list-style-type: none"> Emails Records Of Phone/Mobile Phone calls Using the Contact Form Using the support system 	
Legal and Regulatory	<ul style="list-style-type: none"> Details contained within documents used to maintain compliance with data protection law. 	
Client System Data		
System Data	This is the data that is processed/stored on behalf of The Client.	Account closure

	<p>This data is retained at the discretion of the customer and will only be deleted upon termination of the contract between The Client and Option Software.</p> <p><i>See section 5. Out Products/Services for further details.</i></p>	
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Clients (Trial Subscription)		
Description	Details/Notes	Retention Period
The Client		
The following data is either kept about or in relation to The Client.		6 months from the account closure; <i>unless they become a paying customer</i>
Client Details	<ul style="list-style-type: none"> • The name of the company or the trade name of the individual • Their personal details • Their contact details • Their billing details (if provided) 	
Communication between The Client and Option Software	<ul style="list-style-type: none"> • Emails • Records Of Phone/Mobile Phone calls • Using the contact form • Using the support system 	
Legal and Regulatory	<ul style="list-style-type: none"> • Details contained within documents used to maintain compliance with data protection law. 	
Client Authorised Personal		
The following data is either kept about or in relation to The Client Authorised Personal.		6 months from the account closure; <i>unless they become a paying customer</i>
Personal Details	<ul style="list-style-type: none"> • Their personal details • Their contact details 	
Communication between The Authorised User and Option Software	<ul style="list-style-type: none"> • Emails • Records Of Phone/Mobile Phone calls • Using the Contact Form • Using the support system 	
Legal and Regulatory	<ul style="list-style-type: none"> • Details contained within documents used to maintain compliance with data protection law. 	
Client System Data		
Trial User System Data	<p>This is the data that is processed/stored on behalf of The Client.</p> <p>This data is retained at the discretion of the trial user and will only be deleted upon the closure of The Clients account.</p> <p><i>See section 5. Out Products/Services for further details.</i></p>	Account Closure

Non Client Contact		
Description	Details/Notes	Retention Period
Contact Us, Support Requests and Direct Email	We keep your personal information and copies of your request and our response in case you contact us in the future for more information.	6 Months

	We also use this information to get an idea of exactly what potential clients want. And how the enquiry was managed.	
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Backups		
Description	Details/Notes	Retention Period
Automated Backups	Automated backups contain: <ul style="list-style-type: none"> • Client Data • Client Authorised Personal Data • Client System Data • Contact Us/Support requests (from all sources except email) <p><i>See sections 6. Backups and 6.1. Automated Backups for further details</i></p>	Automated backups are deleted after 7 days unless required by Option Software.
Manual Backups	Manual backups contain: <ul style="list-style-type: none"> • Client Data • Client Authorised Personal Data • Client System Data • Contact Us/Support requests (from all sources except email) <p><i>See sections 6. Backups and 6.1. Automated Backups for further details</i></p>	Manual backups are deleted once there purposed has been fulfilled.

8. If we make any changes to this document

You will be given 30 days notice If we make any changes to this policy.

Attributions

1. ICO Information Commissioner’s Office

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Name	Date Published	Document
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