

### **1. Retention, Archiving and Destruction Policy**

This Retention, Archiving and Destruction Policy has been drafted to set the principles and practices for retaining, reviewing and destroying data. This policy covers all personal client information of BUCHANAN MACLEOD . This policy is to be utilised by all BUCHANAN MACLEOD employees and contractors.

### **2. Scope**

This policy covers all personal client information of BUCHANAN MACLEOD retained in whichever medium such information is contained in. This policy is not restricted to information contained in paper documentation but also electronically stored information. Employees and contractors of BUCHANAN MACLEOD should note, in particular, BUCHANAN MACLEOD's Information Security related policies. Several of these are directly relevant to this policy:

- A. Information Accuracy Policy
- B. Paper File Policy
- C. Password Policy
- D. Cloud Computing Policy
- E. Data Breach Policy
- F. Clear Desk Policy
- G. Shredding Policy
- H. Remote Working Policy
- I. Staff Confidentiality Policy

### **3. Retention Policy**

Retention is defined as the maintenance of documentation which can be accessed by employees and contractors of BUCHANAN MACLEOD in the ordinary course of business. A copy of the client's file and all associated documentation will be kept for a minimum of ONE YEAR following the closing of the file. The guidelines from the Law Society as to file retention and information storage will be followed. The closing of the file is documented by a file closure letter and the date of file closure is as noted on the file closure letter and further recorded on the front of file sheet; on this date, the electronic file will be transferred into BUCHANAN MACLEOD's archiving folder. The original documentation, if in paper format, may be scanned and destroyed in accordance with the guidance from the Law Society of Scotland following this period and follow the above process. If the documentation is not scanned and destroyed it will be archived with BUCHANAN MACLEOD's confidential file storage contractor will destroy documentation in accordance with this policy. The electronic documentation will be retained in accordance with the Society's recommended retention periods, this currently stands at a period of three years.

#### **4. Archiving Policy**

Archiving is defined as secured storage of documentation. Paper documentation shall be archived in secured offsite location with **a contractor of choice of BUCHANAN MACLEOD**. Electronically archived documentation shall be archived in BUCHANAN MACLEOD's archiving folder. The period of archiving of paper or electronically archived documentation will be in accordance with the Law Society of Scotland's recommended retention periods, this currently stands at a period of three years.

#### **5. Destruction Policy**

Destruction is defined as the physical or technical destruction sufficient to render the information contained in the document irretrievable by ordinary commercially available means. The storage contractor appointed by BUCHANAN MACLEOD shall comply with the physical destruction of paper documentation in accordance with this policy, confirmation of such destruction shall be forwarded to BUCHANAN MACLEOD's Data Protection Officer: KAREN E BUCHANAN. Any electronically archived documentation shall be destroyed in accordance with this policy by BUCHANAN MACLEOD's Data Protection Officer: KAREN E BUCHANAN. BUCHANAN MACLEOD's storage has an automatic workflow enabled to delete any archived file from the third year anniversary of the file being uploaded to BUCHANAN MACLEOD's archiving folder. On completion of electronic destruction all available recycle bins shall be deleted to ensure that no documentation be retrievable by ordinary commercially available means.