

1. Introduction

Inet3 Ltd t/as magenta insurance needs to gather and use certain information about individuals (Data Subjects). These can include clients, customers, suppliers, employees and other individuals that magenta insurance has a relationship with or may need to contact. In doing so, magenta insurance is committed to complying with applicable Data Protection Laws and protecting the Data Protection rights of individuals.

This document explains our internal policy Data Retention and the rights of the Consumer.

This policy should be read in conjunction with our Data Protection Policy, Data Subject Rights Policy, Subject Access Request Policy, Information Security Policy & Personal Data Breaches Policy

2. Consumer Legal Rights

Under rules introduced in the General Data Protection Regulation, GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purpose for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).

Under Article 17 of the GDPR individuals have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

Individuals have the right to have their personal data erased in the following circumstances:

- a) Where the personal data is no longer necessary for the purpose which you originally collected or processed it for;
- b) When the person whose data we hold withdraws their consent;
- c) When the Data Subject objects to the processing of their personal data and the company has no overriding legitimate interest to continue this processing;
- d) When the personal data is not being processed lawfully (i.e., in breach of the GDPR);
- e) When the personal data must be erased to comply with a legal obligation; or
- f) Where the personal data is processed to offer information society services to a child.

The right to erasure does not apply if processing is necessary for one of the following reasons:

- a) To exercise the right of freedom of expression and information;
- b) To comply with a legal obligation;
- c) For the performance of a task carried out in the public interest or in the exercise of official authority;
- d) For archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
- e) For the establishment, exercise or defence of legal claims.

This Policy sets out the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to our Data Protection Policy which is available on our website www.magentainsurance.co.uk/privacy or you can request a copy by post or email by contacting our Data Security Manager using the details at the end of this notice.

3. How do we control the Data?

All personal data held by the Company is held in accordance with the requirements of the GDPR and data subjects' rights thereunder, as set out in the Company's Data Protection Policy.

We keep you fully informed of your rights, of what types of personal data we hold about you, how that personal data is used [as set out in our Privacy Policy], and how long we will hold that personal data (or, if no fixed retention period can be determined, how we will decide how long to retain your data).

You have control over the personal data held by us, including the right to have incorrect data rectified, and the right to request that your personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy).

4. How long will we keep your Data?

We will not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

Different types of personal data, used for different purposes, will need to be retained for different periods (which we will regularly review), as set out below.

When we establish or review how long we keep your data we will consider the following points:

- a) The objectives and requirements of the Company.
- b) The type of personal data in question.
- c) The purpose(s) for which the data in question is collected, held, and processed.
- d) The Company's legal basis for collecting, holding, and processing that data.
- e) The category or categories of data subject to whom the data relates.
- f) Contractual obligations we may have with insurers.

If we can't fix a precise retention period for a particular type of data, we will establish criteria for how the retention of the data will be determined, to make sure that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by you or otherwise)

Data Location	Type of Data	Review Period	Purpose of Data	Retention Period or Criteria	Additional Information
Our System & Servers	Personal Data	Annual	To provide Insurance	No less than 7 years after cover ends	Liability cover provided. Insurer Contracts require us to retain for 7 years. Note: In the case of children who have suffered harm or personal injury, the three-year limitation period does not start until the child's eighteenth birthday. Records could therefore be retained for up to 21 years
Our System & Servers	Criminal & Conviction Data	Annual	Annual	Until spent, or until Personal Data is deleted, whichever is sooner	
Our System & Servers	Special Category Data	Annual	Annual	No less than 7 years after cover ends	

5. Who is responsible for the Data we store ?

magenta insurance has a Data Security Manager, who can be contacted on data@magentainsurance.co.uk or 03300 555 210;

The Data Security Manager is responsible for overseeing this Policy and for monitoring compliance with this Policy, and our other Data Protection-related policies (including, but not limited to, our Data Protection Policy), and with the GDPR and other applicable data protection legislation. Department heads are directly responsible for ensuring compliance with the above data retention periods within their own departments.

6. Where you can find more information

You can find more detailed information about your rights, and how data is used in the Insurance market on our website www.magentainsurance.co.uk/privacy

