

# Data Retention Policy for Keys Holiday Cottages

At Keys Holiday Cottages, thereafter, known as KHC, we take data retention very seriously and like all businesses in the UK handling personal data, must adhere to the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. As a result, we have produced this data retention policy that outlines how long different types of data are kept by us and why.

## 1. Core principles of data retention

- **Storage Limitation:** KHC do not keep personal data, guests or owners for longer than is necessary to fulfil the purposes for which it was collected.
- **Purpose Limitation:** Data is only be used for the specific purposes it was collected for.
- **Data Minimisation:** KHC collect the minimum amount of data required for the intended purpose.
- **Accountability:** KHC can demonstrate compliance with GDPR principles.
- **Security:** We store data in the AK system, Supercontrol and Mailchimp, any hard copies are shredded.
- **Transparency:** KHC clearly informs guests and owners about what data is collected, why, how it's used, and how long it's kept.

## 2. Key data categories and retention periods

- **Guest booking details:** According to VisitBritain.org, all serviced and self-catering accommodation premises must keep a record of guests over 16, including full name and nationality, for at least 12 months.
- **Financial records:** Basic customer information (contact, identity, financial, and transaction data) must be kept for seven years after a customer ceases to be a customer for tax purposes. This aligns with typical HMRC records retention of 6 years plus current year.
- **Marketing data:** KHC has explicit consent on our website, via a pop-up form to use customer information for marketing. The data collected is reviewed periodically for relevance and deleted or anonymised when no longer needed. There is also an unsubscribe button on every newsletter sent out by KHC.

- Complaint records: KHC retains enough data to address potential complaints or legal claims. A retention period of 7 years is suggested for complaints without legal action, [according to Re-Engage UK](#).
- Employee records: This is managed by AK.
- CCTV footage: KHC does not operate/own CCTV.

### **3. Creating a data retention policy**

- Data Inventory and Mapping: KHC conducts a thorough audit to identify all personal data collected, processed, and stored annually.
- Retention Schedule: Supercontrol retains inactive guest data for 10 years. Owners' records are archived via Supercontrol immediately after their account is terminated.
- Review and Update: KHC regularly reviews and updates the retention schedule to reflect changes in legislation or business needs.
- Staff Training: KHC ensures all staff understand this policy and their responsibilities in handling personal data.

### **4. Importance of compliance**

- Legal Obligation: KHC adheres to UK GDPR and the Data Protection Act 2018 as a legal requirement.
- Penalties: KHC understands that non-compliance can lead to severe fines and penalties from the ICO.
- Reputation and Trust: KHC understands that a data breach and mishandling can damage the agency's reputation and erode customer trust.

## **Supercontrol – guests' data policies**

Key points about SuperControl's data retention policy:

- **Indefinite storage for active guests:**

Personal booking information is stored indefinitely as long as the guest continues to book with the same property/owner.

- **Deletion after inactivity:**

After 10 years of inactivity (no bookings), the personal data is removed.

- **Limited owner access:**

Owners can only access data for 3 months after the end of the guest's stay.

- **Ownership of data:**

You retain ownership of your data within the SuperControl system, except for data related to reviews in the UpFront Reviews Service, which is owned by SuperControl. You can download your data at any time.

- **Data is kept for business purposes:**

SuperControl keeps the data to understand trends and improve their services.

- **GDPR compliance:**

While GDPR doesn't prescribe specific retention periods, data must be kept no longer than necessary for the purposes it was collected. SuperControl's policy aligns with this principle by deleting data after a reasonable period of inactivity.

- **Right to request removal:**

Guests can request that their information be removed from the system at any time.

- **Right to withdraw consent:**

Guests can withdraw consent for the processing of their personal data at any time.

<https://www.supercontrol.co.uk/policies/privacy/>

**Mailchimp – used for sending out newsletters – sign up required via our website only, pop up and unsubscribe option is given.**

<https://mailchimp.com/help/gdpr-faq/>