

COMPANY POLICY DOCUMENT

Data Retention Policy

How long People Group Services Limited keeps personal data, why, and what happens at the end of the retention period.

Policy owner	Data Compliance Team, People Group Services Limited
Approved by	The Board of Directors
Version	2026.8 (supersedes the undated People Umbrella version)
Effective date	21 August 2026
Next scheduled review	21 August 2027, or earlier on a material change in law or statutory retention requirement
Applies to	All personal data processed by People Group Services Limited and the group employment entities, across umbrella, PEO sole and joint employment models
Classification	Public — published on the Company policy portal

Why this policy has been rewritten

The previous version was issued for the umbrella business, dated its rules from 25 May 2018 and routed all requests to a set of separate mailboxes. It also stated a three-year HMRC period alongside a six-year pension period without making clear which one governs deletion.

This version applies group-wide, states a single operative deletion trigger, adds a full retention schedule beyond worker records, and reflects the **Data (Use and Access) Act 2025**, in force from 5 February 2026.

It is aligned to our Data Protection and Privacy Policy, version 2026.8, and our UK GDPR Compliance Statement, version 2026.8.

1. Purpose and scope

The storage limitation principle requires that personal data is kept for no longer than is necessary for the purposes for which it is processed. This policy sets out how long People Group Services Limited retains personal data, the basis for each period, and what happens when a period expires.

It applies to all personal data we process, in any format, across all our engagement models: umbrella employment, PEO sole employment, joint employment with a named recruitment agency, and services provided to agencies, hirers and Managed Service Providers. In this policy, **Data Subject** means an employee, worker, contractor or candidate.

2. Principles we apply

- 1 We retain personal data only where there is a clear purpose, a legal obligation, or a genuine need to establish, exercise or defend legal claims.
- 2 Where a statutory retention period applies, that period governs, and the data cannot be deleted on request while it runs.
- 3 Where more than one period could apply to the same record, **the longest applicable period governs**, and deletion happens at the end of it.
- 4 Retention is applied automatically by our systems wherever it can be. Manual deletion is the exception, not the rule.
- 5 At the end of the period, data is securely deleted or irreversibly anonymised.

3. Personal data we are likely to hold

- name, date of birth, National Insurance number, address, telephone numbers, email address and next of kin;
- banking details for the payment of wages;
- right to work and identity documents, such as copy passports, visas, share code and eVisa check outputs;
- qualification and screening documents, such as DBS check outcomes, academic certificates and driving licence details;
- payroll details, such as amounts paid, tax and National Insurance, pension and student loan deductions;
- assignment, timesheet, working time and holiday records;
- telephone conversations and notes made from them;
- correspondence, portal activity and support records.

4. Retention rules for workers and candidates

The rules below determine how long we hold a Data Subject's personal data. They replace the rules previously lettered A to E.

Situation	Retention period	Basis
We have processed a placement or payment for the Data Subject	Six complete tax years following the end of the tax year in which the last payment was made, then automatic deletion	HMRC payroll records and pension record-keeping requirements. Six years is the operative trigger because it is the longer of the two.
The Data Subject provided their data personally and accepted our privacy notice, but no placement or payment was processed	12 months, then automatic deletion	Legitimate interests in maintaining an active candidate record. Earlier deletion available on request.
The Data Subject provided their data personally but did not accept our privacy notice, and no placement or payment was processed	Six months, then automatic deletion	Minimised holding period where no ongoing relationship is established. Earlier deletion available on request.
We received the data from a third party, such as a recruitment agency, and the Data Subject has not accepted our privacy notice, and no placement or payment was processed	One month, then automatic deletion	Shortest period consistent with contacting the individual and establishing a relationship. Earlier deletion available on request.
A Data Subject whose data is due for deletion renews their acceptance of our privacy notice	The period resets to 12 months	Renewed relationship.

A point we are often asked about

Where a payment has been made, the six-year period is a **statutory obligation**, not a business preference. A Data Subject cannot require deletion of payroll and pension records inside that period, and we will explain this rather than simply refuse the request.

The other rights continue to apply during that period, including the right of access, the right to have inaccurate data corrected, and the right to complain.

Our systems identify records due for deletion on a monthly cycle. Deletion is then applied automatically, and the fact of deletion is logged.

5. Retention schedule

The following applies to the wider records we hold. Periods run from the end of the relationship, tax year or matter, as indicated. Where a period is described as indicative it reflects the limitation period for bringing a claim rather than a specific statutory retention duty.

Record	Period	Runs from
PAYE and payroll records	3 years (minimum)	End of the relevant tax year
National Minimum Wage records	6 years	End of the pay reference period
Pensions and auto-enrolment records	6 years	End of the relevant scheme year
Auto-enrolment opt-out notices	4 years	Date of the notice
Working time and 48-hour opt-out records	2 years	Date the record was made
Statutory maternity, paternity and sick pay records	3 years	End of the relevant tax year
Right to work check evidence	2 years	End of the employment or engagement
DBS and screening outcomes	Outcome only, 6 months; certificates not retained	Date of the check
Personnel and engagement files	6 years (indicative)	End of the relationship
Recorded telephone conversations	2 years	Date of the call
Complaints records	6 years	Closure of the complaint
Data subject rights request records	3 years	Closure of the request
Personal data breach records	6 years	Closure of the incident
Accident and incident records	3 years	Date of the incident
Marketing consent records	Duration of the relationship	Last interaction
Marketing suppression records	Retained indefinitely	Date of the opt-out
Supplier and contract records	6 years (indicative)	End of the contract
CCTV footage	30 days	Date of recording

6. Deletion, anonymisation and backups

- at the end of a retention period, data is securely deleted or irreversibly anonymised so that it can no longer identify an individual;
- anonymised and aggregated data may be retained indefinitely for statistical and service improvement purposes, because it is no longer personal data;
- where deletion from live systems is complete but the data persists in backups, it is placed **beyond use** – not accessed or used for any purpose – and deleted on the normal backup rotation;
- deletion applies to processors as well. Our Article 28 agreements require processors to delete or return data at the end of the engagement and to confirm that they have done so.

7. Legal hold

Where data is relevant to actual or reasonably anticipated litigation, a regulatory investigation, an HMRC enquiry, a Fair Work Agency investigation or an insurance claim, a **legal hold** is applied. Scheduled deletion is suspended for the affected records until the matter concludes and the hold is formally lifted by the Data Compliance Team. Legal holds are recorded, reviewed periodically, and released promptly once no longer required.

8. Responsibilities

- the **Board** approves this policy and holds ultimate accountability;
- the **Data Compliance Team** maintains the retention schedule, applies and lifts legal holds, and reviews automated deletion runs;
- **system owners** ensure their systems can apply the schedule and evidence deletion;
- **all staff** must not retain personal data outside approved systems – local copies, personal drives, spreadsheets and mailbox archives sit outside the retention controls and must not be used as a record store.

9. Making a request

Data Subjects can ask for a copy of their data, ask for it to be corrected, or ask for it to be deleted. All requests are handled by the Data Compliance Team:

Data Compliance Team, People Group Services Limited

Email: compliance@peoplegroupservices.com

Telephone: 0345 034 1530

Post: Three Horseshoes Walk, Warminster, Wiltshire BA12 9BT

Requests can also be made through the secure worker portal, where much of the data can be viewed and corrected directly.

We respond without undue delay and within one month, extendable by up to two further months where a request is complex. If you are dissatisfied with how we have handled your data, you can complain to us under our Complaints Procedure and, if still dissatisfied, to the Information Commissioner's Office.

10. Review

This policy is reviewed at least annually, and sooner where a statutory retention period changes. The current version is always published on our policy portal.

11. Declaration

This Policy is approved by the Board of Directors of **People Group Services Limited**, Company Number 11570329.

Version: 2026.8 | **Effective:** 21 August 2026 | **Supersedes:** the undated People Umbrella version

Next scheduled review: 21 August 2027



Signed for and on behalf of the Board of Directors

Date
21 August 2026