



P 26 – DATA RETENTION POLICY

Paycheck Plus™		<i>Policy Name</i>	
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1. OVERVIEW

Paycheck Plus acts as a data processor where it processes personal data solely on the instructions of its clients. The clients are the data controllers of the personal data. Where Paycheck Plus acts as a data processor it has put in place data processing agreements with the relevant data controller. Paycheck Plus must process its client's personal data only in accordance with those agreements and on the instructions of the controller from on a scheduled and ad-hoc basis.

2. PURPOSE

The purpose of this policy on retention of personal data sets out certain principles applicable to the retention of personal data processed by Paycheck Plus where it acts as a data processor.

3. SCOPE

This policy applies to all records, irrespective of format, held by, under the control of, or in the possession of Paycheck Plus, for which Paycheck Plus is a data processor.

4. POLICY

- 4.1. As a general rule, personal data is required to be kept in a form which permits identification of the individual for no longer than is necessary for the purposes for which the personal data are processed. Furthermore, under the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), individuals, under certain circumstances, have the right to request the erasure of their personal data ("the right to be forgotten").
- 4.2. Paycheck Plus will retain data for a period of 9 years from the completion of the payroll tax year for which the data was processed in order to ensure that the personal data is available for its clients to comply with all employment related legislative time periods, as well as requirements of the Revenue Commissioners to retain data.
- 4.3. Should a request for deletion be received from the data controller prior to the expiry of the 9-year period, Paycheck Plus will comply with this request.
- 4.4. Paycheck Plus may refuse to comply with such a request or may retain the data for a longer period than 9 years for its own purposes only in very limited circumstances (e.g., where required to do so on foot of a legal obligation) and in accordance with data protection laws. Where Paycheck Plus processes data for its own purposes it becomes the controller of that personal data.

5. POLICY REVIEW

- 5.1. This Policy will be reviewed on an annual basis by the Data Protection Officer and the CEO.

Anne Reilly
Chief Executive Officer
Date: 26th March 2021