

1. Purpose

This policy sets out how long Portland Foodbank retains information to comply with the UK GDPR Principle (e): Storage Limitation. We will review data regularly and delete or anonymize it when it is no longer needed.

2. Retention Schedule

Data Category	Retention Period	Justification
Client Vouchers/Referrals	Max 18 months	Allows creation of annual reports & identification of repeat users.
Financial Records (Gift Aid/Donations)	6 years	HMRC Tax Audit.
Volunteer Records	Deleted annually if inactive	Ensures records are up-to-date.
Donor/Fundraiser Data	3-6 years post last interaction	To maintain relationships, analytics, & donor retention.
General Correspondence	12-18 months	Stored electronically, deleted after review.
Health & Safety (Incidents)	3-6 years	Personal injury claim limit. Data held by premises manager, St Johns Church Hall, Portland.

3. Data Storage and Security

- **Electronic Records:** Stored on secure, password-protected systems.
- **Paper Records:** Stored in locked cabinets, accessible only to authorized personnel.
- **Email:** Emails are not retained indefinitely; they are reviewed annually and deleted if no longer needed.

4. Destruction of Data

- **Paper:** Shredded or securely incinerated.
- **Electronic:** Deleted, with files overwritten or anonymized so the individual cannot be identified.

5. Rights to Access Data (Right to Erasure)

- Individuals have the right to request deletion of their data.
- We will respond to any request within one month (or as soon as possible, max 28 days).
- Data will be deleted unless we have a legal obligation to retain it.

Key Considerations for Food Banks

- **Legitimate Interest:** Food banks often rely on "legitimate interests" to keep data (e.g., managing donations), but this must be balanced with the rights of the individual.
- **Review Process:** The policy should be reviewed annually.
- **Inactive Users:** If a donor or volunteer hasn't engaged for 3+ years, data should generally be deleted or anonymized.
- **Legal Hold:** If litigation is threatened, stop the destruction of relevant data immediately.