

GDPR Personal Data Retention Schedule

Function Description	Example of Data	Retention Period and Purpose
Themis Data	Non intelligence components, address lists, contacts and registrations.	6 years after the individual has resigned from post / no longer has access
CCTV Cameras	Internal CCTV Cameras capturing images 24/7.	30 days, automated deletion (unless held)
Information held regarding staff, not held on existing HR systems	Probation Reports Performance Plans Staff Leave and attendance	Once employment has ended, records transferred to central OHR function and retained for 5 years.
Rotas and calendars in relation to staff.	Outlook Calendars and wall calendars.	Until superseded at end of year.
Records concerning delegated authority to carry out financial activities.	Spending thresholds and authorities.	Financial Regulations FG6, Limitation Act 1984, Value Added Tax Act 1996: retain for a minimum of 6 years.
Expenses claims and authorisations, including for travel and subsistence.	Receipts and authorisations for expenses. Authorisation for specific accommodation requests	Financial Regulations FG6, Limitation Act 1984, Value Added Tax Act 1996: retain for a minimum of 6 years.
Internal Government distribution lists for whole staff emails.	FIU Staff Email distribution	Until superseded, these are constantly updated in relation to staff leaving and joining.
Trivial emails or notes not related to the core business of the FIU or core support functions (e.g. Human Resources, Finance etc.)	Christmas Dinner voting Media of interest that is circulated.	To be kept for a minimum length of time, and no more than 12 months.
Minutes and associated papers of Senior Management Teams / strategic management groups. Including agendas, reports and papers for consideration.		10 years

Minutes and associated papers of other teams / groups. Including agendas, reports and papers for consideration.		6 Years
Data protection subject access request processing records.	Data Subject Access Requests and table data.	Completion of appeal +6 years where appeal made to the Information Commissioner. Completion of request + 3 years where no appeal.
Other Requests in relation to rights made under GDPR - Articles 16-22	Data Subject Access Requests and table data.	Completion of appeal +6 years where appeal made to the Information Commissioner. Completion of request + 3 years where no appeal.
Data protection compliance records. E.g. audits, staff training etc.	ELearn Vannin Records	Current year + 1 year.
Evidence of first aid or manual handling training e.g. certificate, course attendance sheet.		End of current year + 3 years. (Not before superseded.)
Evidence of fire safety training.		Added to personnel records and retained for the same period (as long as this period is over 10 years).
Accidents and incident reporting records relating to adults e.g. RIDDOR accident report / register; accident book entry/forms for minor accidents		Date of entry / last entry in a register + 3 years.
Website Interaction	Contact Form submissions	If information is under the GDPR (not LED) - attached to a Themis record if practicable (MLRO query for example) and falls under the same retention (6+1 years). If 'standard' query not related to LED or existing subject on Themis, retained for 3 years.

LED Personal Data Retention Schedule

Function Description	Example of Data	Retention Period and Purpose
Data protection subject access request processing records.	Data Subject Access Requests and table data.	Completion of appeal +6 years where appeal made to the Information Commissioner. Completion of request + 3 years where no appeal.
Other Requests in relation to rights made under GDPR - Articles 16-22	Data Subject Access Requests and table data.	Completion of appeal +6 years where appeal made to the Information Commissioner. Completion of request + 3 years where no appeal.
Data Collection through Themis and stored within Themis	Disclosures under – <ul style="list-style-type: none"> • Proceeds of Crime Act 2008 • Anti-Terrorism and Crime Act 2003 • Financial Intelligence Unit Act 2016 Research around the above disclosures.	Review after 5 years of initial creation / receipt for operational analysis purposes, deletion following review.
Historic Data Acquired from IoM Constabulary	All documents acquired through the Financial Intelligence Unit (Transfer of Property, Rights and Liabilities) Order 2018	Review after 5 years of initial creation / receipt for operational analysis purposes, deletion following review.
Data Collection from AG's in relation to ILOR data	Under Section 5(1)a the FIU receives all information acquired by the Attorney General's under the International Letters of Request process. This information is transferred to the FIU for intelligence purposes.	Review after 5 years of initial creation / receipt for operational analysis purposes, deletion following review.