

## **Sabina Challenger Consultancy Limited trading as It's My Family**

### **DATA RETENTION POLICY**

**2026**

#### **1. Introduction**

This Policy sets out the obligations of Sabina Challenger Consultant Limited ("**Company**") regarding retention of personal data collected, held, and processed by the Company in accordance with EU Regulation 2016/679 General Data Protection Regulation ("**GDPR**").

This policy does not form part of any employment contract and we may amend it at any time.

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR also addresses "special category" personal data (also known as "sensitive" personal data). Such data includes, but is not necessarily limited to, data concerning the data subject's race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

In addition, the GDPR includes the right to erasure or "the right to be forgotten". Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

- a) Where the personal data is no longer required for the purpose for which it was originally collected or processed;
- b) When the data subject withdraws their consent;
- c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
- d) When the personal data is processed unlawfully (i.e. in breach of the GDPR); or
- e) When the personal data has to be erased to comply with a legal obligation.

This Policy sets out the type(s) of personal data held by the Company, the period(s) for which that personal data is to be retained, the criteria for

establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

## **2. Aims and Objectives**

The aims of this Policy are (i) to set out limits for the retention of personal data; (ii) to ensure that those limits, as well as further data subject rights to erasure, are complied with; (iii) to ensure that the Company complies fully with its obligations and safeguard the rights of data subjects under the GDPR; and (iv) to improve the speed and efficiency of managing data.

## **3. Scope**

This Policy applies to all personal data held by the Company which is stored in the following ways and in the following locations

The Company's cloud-based practice management system, Zanda, including client records, appointment information, invoices, communications and other personal data held within the system;

- a) Zoom, where personal data is processed in connection with online consultations, meetings and related communications;
- b) Computers permanently located at the Company's premises;
- c) Laptop computers and other mobile devices provided by the Company to its employees;
- d) Company mobile phones, including personal data contained in or accessed through calls, messages, email, applications and other business communications;
- e) Computers and mobile devices owned by employees, agents or contractors where such devices are authorised for business use and may contain or provide access to Company personal data;
- f) Microsoft Outlook and Microsoft 365 cloud services, used for business email correspondence and the storage and processing of emails, attachments and other personal data;
- g) Google Mail (Gmail), used for business email correspondence and the storage and processing of emails, attachments and other personal data;
- h) Wix, used to host and manage the Company's website and to collect or process personal data submitted through the website;
- i) Wix Payments, used to process payments and associated transaction information made through the Company's website;
- j) Any other authorised cloud-based systems, applications, storage facilities or electronic devices used by the Company to process, access or retain personal data;
- k) Personal data retained in accordance with the Company's data retention policy, including archived or backed-up information where applicable.

#### **4. Data Disposal**

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 4.1 Personal data stored electronically (including any and all backups thereof) shall be permanently deleted; and
- 4.2 Personal data stored in hardcopy form shall be shredded and securely disposed of.

#### **5. Data Retention**

- 5.1 As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.
- 5.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.
- 5.3 When establishing and/or reviewing retention periods, the following shall be taken into account:
  - 5.3.1 The objectives and requirements of the Company;
  - 5.3.2 The type of personal data in question;
  - 5.3.3 The purpose(s) for which the data in question is collected, held, and processed;
  - 5.3.4 The Company's legal basis for collecting, holding, and processing that data; and
  - 5.3.5 The category or categories of data subject to whom the data relates.
- 5.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
- 5.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

| Type of Data                                     | Purpose of Data                                                                                                                            | Review Period                                     | Retention Period or Criteria                                                                                                             | Comments                                                                                                    |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Client first and second name                     | To identify the client, maintain client records and provide consultancy services.                                                          | Annually and when the client relationship ends.   | For the duration of the client relationship and thereafter only as necessary for legal, accounting, tax or legitimate business purposes. | Minimum information necessary is collected.                                                                 |
| Telephone number                                 | To communicate with clients regarding consultations, appointments and services.                                                            | Annually and when the client relationship ends.   | For the duration of the client relationship and thereafter only where necessary.                                                         | May be stored/accessed through the mobile phone and Zanda.                                                  |
| Email address                                    | To communicate with clients and provide correspondence relating to services.                                                               | Annually and when the client relationship ends.   | For the duration of the client relationship and thereafter only as necessary for legal, accounting, tax or legitimate business purposes. | May be stored in Outlook/Microsoft 365 and Gmail.                                                           |
| Payment and bank details                         | To receive, reconcile and record payments.                                                                                                 | Annually and as part of financial records review. | For as long as required for accounting, tax or legal purposes.                                                                           | Wix Payments processes payment information where applicable.                                                |
| Downloads and documents containing personal data | To provide or receive information and documents required for the consultancy service.                                                      | Annually and when the client relationship ends.   | For as long as necessary for the purpose for which they were obtained and thereafter where legally or legitimately required.             | Unnecessary downloaded copies should be securely deleted.                                                   |
| Deleted emails                                   | Emails may contain client correspondence and personal data.                                                                                | Periodically as part of mailbox maintenance.      | Deleted emails should be permanently deleted when no longer required, subject to any legal, contractual or legitimate business need.     | Deleted-item/recycle-bin folders should be reviewed periodically.                                           |
| Call recordings                                  | Where calls are recorded, to provide a record of communications, quality assurance, dispute resolution or other stated legitimate purpose. | Annually and when the relevant purpose has ended. | Only for as long as necessary for the stated purpose, after which recordings should be securely deleted.                                 | Clients should be informed where calls are recorded and the appropriate lawful basis should be established. |

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| Live chat history                                                | To respond to enquiries, provide customer service and maintain a record of client communications.              | Annually and when the client relationship ends.   | For as long as necessary to deal with the enquiry and any resulting client relationship, then deleted or anonymised unless otherwise required. | May be stored within Wix or another website/chat service.                                           |
| Wix website data                                                 | To operate the website, manage enquiries and provide information and services to clients.                      | Annually.                                         | For as long as necessary for the relevant purpose and in accordance with Wix's applicable retention arrangements.                              | Includes information submitted through website forms and other website interactions.                |
| Wix CRM data                                                     | To manage prospective and existing client relationships, enquiries, communications and service administration. | Annually and when the client relationship ends.   | For the duration of the client relationship and thereafter only as necessary for legal, accounting, tax or legitimate business purposes.       | Should be reviewed and unnecessary records deleted.                                                 |
| Recycle Bin / deleted customer data                              | Temporary storage of deleted records before permanent deletion.                                                | At least annually and preferably more frequently. | Permanently deleted when no longer required, subject to any legal or legitimate retention requirement.                                         | Deleted information should not be retained indefinitely simply because it remains in a recycle bin. |
| Customer complaints                                              | To investigate, respond to and resolve complaints and identify any improvements required.                      | Annually and following closure of each complaint. | Retained for as long as reasonably necessary to deal with the complaint and any resulting legal or business requirements.                      | Complaints should be securely deleted when no longer required.                                      |
| Data protection requests                                         | To record and respond to requests relating to individuals' data protection rights.                             | Annually and following completion of the request. | Retained for as long as necessary to demonstrate compliance and deal with any related legal or regulatory matter.                              | Includes subject access requests and other data protection rights requests.                         |
| Consent records for personal and sensitive/special category data | To demonstrate that valid consent has been obtained where consent is relied upon as the lawful basis for       | Annually and whenever consent is changed or       | Retained for as long as necessary to demonstrate when and how consent was obtained and managed.                                                | Records should include the date, scope and method of consent and any withdrawal of consent.         |

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|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
|                                                   | processing.                                                                                                              | withdrawn.                                      |                                                                                                                                                       |                                                             |
| Legal contracts                                   | To establish and manage contractual relationships with clients and protect the Company's legal and commercial interests. | Annually and when the contract ends.            | For the duration of the contract and thereafter for as long as necessary to meet legal, accounting, tax, limitation or other legitimate requirements. | Final signed versions should be retained securely.          |
| Appointment and client correspondence information | To arrange and administer one-to-one consultations and maintain an appropriate client record.                            | Annually and when the client relationship ends. | For the duration of the client relationship and thereafter only as necessary for legal, accounting, tax or legitimate business purposes.              | May be held in Zanda, Outlook/Microsoft 365, Gmail or Zoom. |

## 6. Roles and Responsibilities

- 6.1 [The Company's Data Protection Officer is Sabina Challenger contact@its-myfamily.com.
- 6.2 The [Data Protection Officer] shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other Data Privacy-related policies (including, but not limited to, its Privacy Policy), and with the GDPR and other applicable data protection legislation.
- 6.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods throughout the Company.
- 6.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Officer.

## 7. Implementation of Policy

This Policy shall be deemed effective as of 19.08.2026. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

**Name:** Sabina Challenger

**Position:** Company Director

**Date:** 19.08.2026

**Due for Review by:** 19.08.2026

**Signature:** Sabina Challenger