

Wates Group is a family-owned Construction, Development, House Building, Property Maintenance, Building Services, Facilities Management and Managed Workspace business. As a leader in our chosen markets, our objective is to deliver excellent products and services to our customers safely, professionally and consistently.

1. EXECUTIVE SUMMARY

1.1 PURPOSE OF THIS POLICY

During the course of Wates' activities, Wates will collect, store and process a large number of records and they need to be treated in an appropriate and lawful manner.

For the purposes of this Policy, Wates comprises the following legal entities:

Wates Group Limited; Wates Construction Limited; Wates Developments Limited; Wates Group Services Limited; Needspace? Limited; Wates Construction International LLC; Wates Construction Services Limited; Wates Living Space (Maintenance) Limited; SES (Engineering Services) Limited; and Purchase Group.

It is intended that this Policy will also apply to any further companies which at any time form part of Wates. This Policy may be amended at times.

1.2 BUSINESS OBJECTIVES

The business objectives of this policy are: Business Records are stored by Wates and dealt with appropriately and in accordance with legal and regulatory requirements.

No Business Records are destroyed, other than in compliance with legal and regulatory requirements.

No Business Records are kept by Wates unnecessarily. In addition to this being a legal requirement this results in:

- A reduction of storage costs
- A reduction of costs and time spent dealing with disclosure subject access requests.

All Wates employees are required to be aware of their and Wates' legal and regulatory obligations in relation to records retention.

1.3 GOVERNANCE

The Wates Privacy Team is responsible for the maintenance and oversight of compliance with this Policy, and assessing the Policy annually.

2. POLICY DETAIL

2.1 Business and Non-Business Records

2.1.1 Business Records

A Business Record documents Wates' legal obligations or critical business activities and transaction. Only Business Records should be retained for the periods prescribed by the Retention Schedules.

Business Records should be retained for the periods prescribed by the Retention Schedules. Business Records created by employees, consultants, and independent contractors in the course of performing business activities for Wates are business assets and exclusive property of Wates, not the individual. Business Records must remain on Wates' premises or in a Wates approved secure storage facility unless they are taken offsite in furtherance of Wates business subject to approved security precautions.

Business Records can appear in any format including:

- Writing;
- Drawings;
- Graphs;
- Charts;
- Presentations;
- Diagrams;
- Spreadsheets;
- Photos.

Business Records can appear in any medium including:

- Paper (hardcopy records);
- Computer files;
- Electronic data;
- E-mail;
- DVDs;
- Portable storage devices;
- Network servers;
- Hard drives;
- Voice recordings.

2.1.2 Non-Business Records

Non-Business Records are items that do not support or document Wates' business operations. Non-Business Records:

- Do not contain significant business information; or

- Are only needed for a limited period of time or as a reference; or
- Are for informational purposes only.

Non-Business Records should be disposed of when they are no longer useful for the purpose for which they were created.

2.2 REGULATORY REQUIREMENTS FOR THE RETENTION OF DATA

2.2.1 There are various statutory legislative periods which require Wates to keep certain records for prescribed time periods, as set out in the Retention Schedules.

2.2.2 For the purposes of Applicable Data Protection Laws (the Data Protection Act 1998 and/or the General Data Protection Regulation 2016/679 and/or any other applicable data protection law in effect from time to time), Personal Data (as defined in the Applicable Data Protection Laws) must not be kept longer than is necessary, and many Business Records will contain Personal Data.

2.3 RETENTION AND DESTRUCTION OF WATES RECORDS

2.3.1 Hardcopy Business Records

Hardcopy Business Records must be retained and disposed of in accordance with the Schedules. Active working files should be stored at Wates' premises for easy access. Business Records that are no longer used on a routine basis should be moved to a Wates offsite storage facility. Once the retention period set out in the Retention Schedules has expired, hardcopy Business Records must be destroyed through the use of secure shredding.

2.3.2 Imaging of Hardcopy Records

Once a hardcopy Business Record is imaged, the paper record should be destroyed unless there is a reason why the hardcopy Business Record must be retained. This may be the case in relation to certain types of documents such as legal contracts. If in doubt, please contact the Wates Legal Department, who will be able to advise on whether a hard copy needs to be retained. Where there is no need to retain a hardcopy Business Record and an image has been created,

the hardcopy Business Record must be securely destroyed. The resulting image must be saved in "read only" format and will be subject to the Schedules.

2.3.3 Duplicate Records

Duplicate records are exact replicas of an original record that do not contain additional information or markings. Duplicate records do not need to be retained and should be securely destroyed unless required for a legitimate purpose.

2.3.4 Drafts

Drafts are preliminary versions of Business Records. Drafts should be destroyed upon issuance of a superseding draft of the final Business Record, unless there is a legal reason to retain a draft as a separate Business Record (please consult with Wates Legal for guidance).

2.3.5 Electronic Records

Employees must ensure that they retain and delete electronic Business Records that are held on their computers, mobile devices or removable drives in accordance with this Policy and the Schedules, and in accordance with this Policy and the Schedules, and in accordance with Wates' IT Policy.

- **Email Business Records:** Some emails may be Business Records. Employees are responsible for determining whether this is the case, and, if an email is a Business Record, it should be deleted once the retention period set out in the Retention Schedules has expired.
- **Instant Messaging:** Messages and communications created using the instant messaging may also constitute Business Records. Wates' instant messaging system does not currently automatically save instant messages. If an instant message constitutes a Business Record, the employee must manually save the instant message and it will then be subject to this Policy and the Schedules.
- **Voicemail:** Voicemail messages may constitute Business Records. If a voicemail contains information that would render the voicemail a Business Record, the employee must transcribe or summarise the contents of the voicemail. The resulting Business Record will be subject to this Policy and the Schedules.

- **Electronic Backup records:** Backup copies of electronic Business Records must only be created and managed by Wates' IT Department, who shall be responsible for managing these Business Records in accordance with this Policy and the Schedules.

2.4 RETENTION OF PERSONAL DATA AND RECORD KEEPING

- 2.4.1 Wates' Data Protection Policy governs the use of personal data within Wates. Wates is committed to ensuring that the Personal Data it holds and processes is not excessive and is retained for no longer than is necessary. Where a Business Record contains Personal Data, Wates employees shall not retain such Personal Data for longer than is necessary. The retention periods set out in the Schedules take the data protection requirements into account and it is the responsibility of all Wates employees to ensure that these requirements of the Applicable Data Protection Laws are met at all times.
- 2.4.2 Queries on whether data should be held and/or retained should be discussed with your Line Manager in consultation with the Privacy Team as required.

2.5 SUSPENSION OF THE RETENTION SCHEDULES

- 2.5.1 The Retention Schedules may be suspended under certain circumstances. These include a request from a Court of a tribunal. The legal team will advise further in the event of any such request being received by Wates.

2.6 COMPLIANCE WITH THIS POLICY

- 2.6.1 All Wates employees must comply with this Data Retention Policy.
- 2.6.2 A failure or refusal to comply with this Policy may be considered a disciplinary offence which may lead to disciplinary action. Please see the Data Protection Policy for further information.

2.7 QUERIES

- 2.7.1 Queries relating to this Policy or the Schedules should be directed to the Privacy Team at gdpr@wates.co.uk or Wates' Data Protection Manager.

2.8 APPENDICES

- Gov-307 Archiving Rules
- Gov-308 Management of Documents and Records Rules



For and on behalf of the Executive Committee
DAVID ALLEN
Chief Executive, October 2021