

1. Introduction

This is the retention policy of Nviron Limited ("Nviron", "us" or "we"), which applies to records we hold containing or relating to personal data, except personal data relating to any person in connection with their employment or engagement by Nviron (which is covered by a separate policy).

When we refer to personal data in this policy, this means any information about an individual from which that person can be identified. For more information about personal data and how we use it, please see our [Privacy Policy](#).

2. About this policy

This policy sets out:

- the general timescales for which we will retain relevant records;
- requirements for the disposal of relevant records.

This policy only relates to records we hold containing or relating to personal data. Other records are covered by other policies.

Our Company Secretary is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, please contact our Company Secretary using the contact details set out at the bottom of this policy.

This version of the retention and disposal policy is effective as of **30 September 2023**.

3. Changes to this policy

We reserve the right to amend this policy at our sole discretion, without prior notice to you. However, this does not affect your applicable rights as set out in our [Privacy Policy](#).

4. Records covered by this policy

This policy applies to relevant records applicable to personal data held by Nviron:

- relating to individuals we deal with (other than in connection with the employment or engagement of people by us), such as the customers and suppliers of Nviron; and
- which we obtain from third parties or through use of our website.

Unless otherwise specified, this policy refers to both paper records and 'soft copy' records.

5. How long we will keep relevant records

Records will ordinarily only be kept for as long as is necessary for the purposes for which the relevant personal data is to be used, as set out in our [Privacy Policy](#). However, the retention period may be longer:

- in accordance with any applicable provisions of our [Privacy Policy](#), or
- if permitted or required by legal and regulatory requirements.

The Record Retention Schedule below sets out the applicable retention periods we normally apply to relevant records.

6. Review

Notwithstanding the Record Retention Schedule below, our Company Secretary will from time to time review the retention periods for records or different categories of information and will determine whether they should be destroyed or retained for a further period, having regard to applicable legal and regulatory requirements or the provisions of our [Privacy Policy](#).

7. Destruction of records

Relevant records will be destroyed in the following ways:

- records held in paper format will be cross-cut shredded and pulped or burnt;
- electronic or soft-copy records will be destroyed using means appropriate to render them non-recoverable;
- where applicable, individual folders will be permanently deleted from the system; and
- electronic equipment which is disposed of which contains relevant records will be destroyed after first using killdisk (or similar) to permanently erase the relevant records.

8. Records of destructions

We will not be obliged to document the disposal of records when doing so in accordance with the Record Retention Schedule.

Where we dispose of relevant records other than in accordance with the Record Retention Schedule (either by being disposed of earlier or kept for longer than listed), we will ordinarily document such disposal for audit purposes (but without referring to any identifiable individual to which the records related).

9. Contacting us

If you have any questions about this policy, or if you wish to exercise your rights as referred to in this policy, please contact us by:

- writing to us at:
Company Secretary
Nviron Limited
Unit 6, Abbots Park
Monks Way
Preston Brook
Runcorn
Cheshire
WA7 3GH

or:

emailing our Company Secretary by sending an email to: admin@nviron.co.uk.

10. Record Retention Schedule – customer/supplier/website records

Description	Retention Period	Comments/Relevant Legislation
Website/general enquiries records or contact details provided by third parties (where no contract is entered into)	1 year after the last date of enquiry (or relevant longer period where information used for legitimate purposes or with consent)	
Credit check results	1 year	
Contracts which include personal data (other than those executed by way of deed)	7 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to the above contracts, including payments and financial information	7 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Contracts executed by way of deed which include personal data	13 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to the above contracts, including payments and financial information	13 years after termination of contract/activities undertaken in connection with contracts (whichever is longer)	Limitation Act 1980
Records relating to legal proceedings (other than relating to contracts executed by way of deed)	7 years from the date on which the dispute arose or legal proceedings were threatened/ contemplated/ issued/ concluded (whichever is longer)	Limitation Act 1980
Records relating to legal proceedings relating to contracts executed by way of deed	13 years from the date on which the dispute arose or legal proceedings were threatened/ contemplated/ issued/ concluded (whichever is longer)	Limitation Act 1980
Application forms/records relating to proposed contracts	1 year after date of last record/activity	