

DATA RETENTION POLICY

1. Purpose

The purpose of this data retention policy is to establish guidelines for the retention and disposal of various types of data collected and stored by Callwell Limited. This policy ensures compliance with applicable laws and regulations while also safeguarding the privacy and security of sensitive information.

2. Scope

This policy applies to all employees, contractors, and third-party vendors who have access to and handle data on behalf of Callwell Limited.

3. Definitions

Call Records - Information pertaining to incoming and outgoing phone calls, including but not limited to call duration, time and date of call, phone numbers involved, and any associated metadata.

Call Recordings - Recordings of calls to and from Customers including calls from Customers to Consumers.

Consumer Data - Personal information collected from customers or clients, including but not limited to names, addresses, phone numbers, email addresses, billing information, and any other data obtained during the course of business interactions.

4. Retention Periods

Call Records - Call records will be retained for a period of 7 years from the date of the call. After this period, call records will be securely disposed of in accordance with data disposal procedures outlined in this policy.

Call Recordings - Call recordings will be retained for a period of 30 days from the date of the call. After this period, call records will be securely disposed of in accordance with data disposal procedures outlined in this policy.

Consumer Data - Consumer Data will be retained for a period of 7 years from the date of collection or the termination of the business relationship, whichever occurs later. After this period, Consumer Data will be securely disposed of in accordance with data disposal procedures outlined in this policy. Where Consumer Data is contained within an email that is unable to be handled by our systems, the retention period is reduced to 1 month from the date of collection or termination of the business relationship.

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5. Data Security

All data, whether in transit or at rest, must be adequately secured to prevent unauthorized access, disclosure, alteration, or destruction. Access to sensitive data should be restricted to authorized personnel only, and encryption should be employed where appropriate to protect data confidentiality. Transfer of data from Callwell to a Customer should be transferred using a secure data room where possible.



6. Data Disposal

At the end of the retention period, data must be securely disposed of using methods that ensure permanent and irretrievable destruction. This may include shredding physical documents or using secure data wiping software to erase digital files. Disposal procedures must comply with relevant laws and regulations governing data protection and privacy.

7. Compliance

All employees, contractors, and third-party vendors are responsible for adhering to this data retention policy. Any violations of this policy may result in disciplinary action, including termination of employment or contract.

8. Review and Updates

This data retention policy will be reviewed regularly to ensure compliance with changes in laws, regulations, and industry best practices. Updates to the policy will be communicated to all relevant parties, and training will be provided as necessary to ensure understanding and compliance.

9. Policy Acknowledgment

By accessing or handling data on behalf of Callwell Limited, all employees, contractors, and third-party vendors acknowledge their understanding of and agreement to comply with this data retention policy.

10. Contact Information

For questions or concerns regarding this policy, please contact the Quality Representative of Callwell, Rob Wellstead at rob@callwell.co.uk