



## BRITISH AMERICAN FOOTBALL REFEREES ASSOCIATION LIMITED

### **Data Destruction Policy**

#### Document Purpose

This document is designed to provide the guidelines and timelines in which documents will be identified for destruction and the procedures by which these documents should be destroyed. This document will also outline the process for which a document can be placed on legal hold from destruction.

#### Audience

The intended audience of this document is the membership British American Football Referees Associations Limited ("BAFRA") including but not limited to its directors and any third-party suppliers acting on behalf of BAFRA.

#### 1.0 Scope of Policy

- 1.1 The scope of this policy is to include all documents listed in the records retention policy and provide the processes for which documents for deletion are to be identified and destroyed.

#### 2.0 Identification of documents

- 2.1 It is the responsibility of the "Person Responsible" identified in the "Retention of Records Policy" to ensure all records are reviewed on a quarterly basis ("deletion cycle") to identify all records which are beyond their retention period.
- 2.2 Once the documents for destruction are identified an itinerary of these should be produced.
- 2.3 The itinerary should then be checked by the Data Protection and Compliance Officer against the legal hold list for any documents which are under legal hold.
- 2.4 Any documents not under legal hold should then be destroyed.

#### 3.0 Destruction of documents

- 3.1 All paper/physical documents must be destroyed by a process which renders the document unrecoverable or readable by a method such as but not limited to:
  - 3.1.1 Shredding (cross cut shredder)
  - 3.1.2 Burning
  - 3.1.3 Mulching
  - 3.1.4 Pulping
- 3.2 Once destroyed the resulting remains must be checked to ensure thorough destruction has been completed.

- 3.3 Any electronic records must be destroyed by a process which makes them unrecoverable such as, but not limited to:
  - 3.3.1 Degaussing (for entire hard drives or digital storage devices)
  - 3.3.2 PGP shredding
  - 3.3.3 Permanent deletion
- 3.4 Once the documents are destroyed the data of destruction of each document shall be recorded in a register held by the Data Protection and Compliance Officer.
- 3.5 It is permissible for destruction to be carried out by a licenced destruction specialist.

#### 4.0 Legal Hold

- 4.1 A document can be placed on legal hold for reasons such as but not limited to:
  - 4.1.1 Ongoing legal action
  - 4.1.2 Legislative requirement
  - 4.1.3 Regulatory requirement
  - 4.1.4 Contractual obligation
  - 4.1.5 Insurance requirement
  - 4.1.6 Legal obligation
- 4.2 For a document to be placed on legal hold this must have approval from at least two (2) directors of BAFRA or outside legal counsel.
- 4.3 The list of documents on legal hold will be maintained by the Company Secretary.
- 4.4 The list of documents on legal hold shall be reviewed on a quarterly basis to ensure the need for legal hold remains.
- 4.5 Once the need for legal hold has passed the legal hold shall be lifted.
- 4.6 Upon lifting of the legal hold the document shall be destroyed in line with the policy in the next deletion cycle.