



Data Removal Policy 2026

1. Purpose

The purpose of this Data Removal Policy is to outline how Roman Electrical Ltd. manages the secure deletion and disposal of personal, commercial, and operational data. This policy ensures compliance with applicable data protection laws, protects the privacy of our clients, employees, and suppliers, and reduces the risk of unauthorized access or data breaches.

2. Scope

This policy applies to all employees, contractors, and third parties who handle or have access to data collected, processed, or stored by Roman Electrical Ltd. It covers data in both **electronic** and **physical** formats, including but not limited to:

- Customer details and project information
 - Employee records
 - Supplier and subcontractor information
 - Financial and operational data
 - Emails, messages, and job documentation
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3. Data Categories and Retention Periods

Data Type	Examples	Retention Period	Deletion Method
Customer Records	Contact details, project documents, invoices	7 years after project completion	Secure digital deletion and/or paper shredding
Employee Records	Personal info, training, payroll, HR docs	6 years after employment ends	Secure digital deletion and shredding of hard copies
Supplier/ Subcontractor Data	Contact info, contracts, invoices	7 years after last transaction	Secure digital deletion and shredding
Financial Records	Invoices, receipts, tax documentation	7 years (for legal/tax compliance)	Secure deletion after accounting review
CCTV Footage (if applicable)	Site or office footage	30-90 days unless required for investigation	Automatic overwrite or secure deletion
Email Correspondence	Customer or supplier communication	3 years after last contact	Secure deletion from mail servers

4. Data Removal Procedures

4.1 Digital Data Removal

- Files stored on company servers, cloud platforms, or devices will be deleted using **secure data erasure tools** (e.g., overwriting or cryptographic wiping).
- Deleted files must be removed from **recycle bins and backups** in accordance with the retention schedule.
- Company IT systems will automatically purge archived data after the defined retention period.

4.2 Physical Data Removal

- Paper documents containing personal or confidential data must be **cross-cut shredded** or securely destroyed by an approved service provider.
- Disposal records must be kept for audit purposes.

4.3 Portable Devices and Media

- Before disposal or repurposing, all laptops, tablets, USB drives, and other media must be **wiped using certified destruction software**.
 - Faulty devices must be disposed of via **an approved IT asset disposal partner** who issues a destruction certificate.
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5. Customer Data Deletion Requests

- Customers may request deletion of their personal data at any time by contacting [Insert Data Protection Contact/Email].
 - Requests will be verified and processed within **30 days**, except where retention is required by law (e.g., tax or safety records).
 - Confirmation of deletion will be provided in writing upon completion.
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6. Responsibilities

- **Data Protection Officer / Office Manager:** Oversees implementation of this policy and approves deletion requests.
 - **IT Manager:** Ensures secure data deletion tools and systems are in place.
 - **All Employees:** Must follow this policy when handling or disposing of data.
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7. Record Keeping

All data deletion actions must be logged, including:

- Date and method of deletion
- Data type and volume
- Person responsible
- Confirmation of destruction

These records are retained for **3 years** for compliance purposes.

8. Policy Review

This policy will be reviewed **annually** or following any significant change in data protection law, business processes, or IT systems.

9. Related Policies

- Data Protection & Privacy Policy
- Information Security Policy
- IT Acceptable Use Policy
- Records Retention Schedule

Signed: **Sebastian Botiz**
Roman Electrical LTD
Director
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