

Lawton Communications Group Data Retention Policy

How long do we keep your data for and when & how do we delete it?

This purpose of this policy is to ensure that Lawton Communications Group Ltd (**LCG**) and its subsidiaries – Dragonfish Consulting Ltd., Five by Five Ltd., FbF Global Pty Ltd., Five by Five Digital LLC, Concio Group Ltd., and The Stile Agency Ltd., give you clear information on how long data and documentation is retained for. This policy is intended to aid both Clients and Employees of LCG.

Throughout this document when you see the words ‘us’, ‘we’ and ‘our’ this is referring to LCG.

We are a limited company, registered in England and our Company Registration Number is 09475580 and our registered office is 24-28 Bloomsbury Way, London WC1A 2SN. All additional subsidiary Company Information is contained in the final page.

Our Group ICO Data Controller registration number is: ZA283779 and the registration numbers for our subsidiaries are: Dragonfish Consulting Ltd. ZA283464, Five by Five Ltd. Z5736953, Concio Group Ltd. ZB740111, The Stile Agency Ltd. ZB740123.

We operate a group of Global Marketing & Advertising Agencies and Consulting Companies. We collect personal data to allow us to maintain our own records and accounts, and to support our employees in the furtherance of all business processes.

If you have any questions regarding data retention you should make contact with our Data Protection Officer using the company details above or email dpo@lawtoncommsgroup.com

Administration

LCG collects Personal Data to carry out our business. The administration of this data is overseen by the directors of LCG. Any data collected will only be used for the purpose it was gathered for and in line with UK GDPR legislation.

Suspension of Record Disposal

There may be certain occasions where information needs to be preserved beyond the limits set out in this policy. These situations may include, but are not limited to:

- Legal proceedings or a regulatory (or similar) investigation
- A crime is suspected or detected
- Information is relevant to a company in liquidation where a debt is due to LCG

The Data Protection officer will take immediate steps to promptly inform all affected parties if data retention beyond the limits sets out in this policy occurs.

Data Type	Nominal Retention Period	Narrative
Email & Correspondence	5 Years	We keep emails to prove work carried out happened or to refer to in case of any disagreement over instructions given or received. There is the possibility that some emails are kept for more than 5 years if a staff member is employed beyond that length of time as their archive will not be purged until they leave our employment.
Project Files	3 Years	We keep project files for 3 years upon completion of the project. We manually delete files, prints and products older than 3 years, with the exception of source files.
Financial Information	7 Years	We hold electronic and paper financial records for 7 years in-line with HMRC guidelines. We have them manually destroyed by using a Secure Shredding Company at the end of the retention period.

Website Submissions	3 Months	Data submitted to us via any contact form via our Group websites is retained for no longer than 3 months. After this period of time, the entries are automatically deleted.
Employee Details	7 Years	When an employee leaves employment, their file is reviewed and purged of non-essential information. We retain core details of ex-employee members for 7 years. We do this in case we need to provide references for ex-employees moving on to new jobs, or if we need to provide HMRC with details of any previous payment or tax history.
Corporate Records	Permanent	Our corporate records are permanently retained on the Companies House website maintained gov.uk

Locations

London

24-28 Bloomsbury Way, London WC1A 2SN. Tel +44 (0)20 3556 3664

Southampton

Enterprise House, Ocean Way, Southampton SO14 3XB. Tel +44 (0)23 8082 8500

Los Angeles

3415 S. Sepulveda Blvd. Los Angeles CA 90034. Tel +1 (310) 300 4848

Sydney

Suite 25, Bay 5-7 North, 2 Locomotive Street, Sydney NSW 2015. Tel +61 (0)2 8599 8782

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