

Who	What Type	Source	Legal Basis	When Originally	Updated	Retention	Purge After	Determined By
Current client data on Accounting records	Client name	Client	Perf. Of Contract	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 7 years	Internal Policy
	Client address	Client	Perf. Of Contract	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 7 years	Internal Policy
	Client bank details	Client	Perf. Of Contract	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 7 years	Internal Policy
	Client telephone numbers	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 7 years	Internal Policy
	Client personnel contact details	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 7 years	Internal Policy
Former client data on Accounting records	Client name	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 7 years	Internal Policy
	Client address	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 7 years	Internal Policy
	Client bank details	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 7 years	Internal Policy
	Client telephone numbers	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 7 years	Internal Policy
	Client personnel contact details	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 7 years	Internal Policy
Current personnel data on HR/Payroll records	Name	Individual	Legitimate Interest	Became Employee	As needed	Date of employment + 6 years	Date of employment ceased + 7 years	Internal Policy
	Address	Individual	Legitimate Interest	Became Employee	As needed	Date of employment + 6 years	Date of employment ceased + 7 years	Internal Policy
	Personnel details	Individual	Legitimate Interest	Became Employee	As needed	Date of employment + 6 years	Date of employment ceased + 7 years	Internal Policy
Retired/former personnel data on HR/Payroll records	Name	Individual	Legitimate Interest	Became Employee	As needed	Date of employment ceased + 6 years	Date of employment ceased + 7 years	Internal Policy
	Address	Individual	Legitimate Interest	Became Employee	As needed	Date of employment ceased + 6 years	Date of employment ceased + 7 years	Internal Policy
	Personnel details	Individual	Legitimate Interest	Became Employee	As needed	Date of employment ceased + 6 years	Date of employment ceased + 7 years	Internal Policy
Prospective client data on Dynamics records	Client name	Client	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
	Client address	Client	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
	Client telephone numbers	Client	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
	Client personnel contact details	Client	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
	Who contacted from PulseLearning / I Am Here	PulseLearning / I Am Here	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
	Details of projects (prospective)	PulseLearning / I Am Here	Legitimate Interest	On Discovery	As needed	2 Years	20 years	Internal Policy
Current client data on Dynamics records	Client name	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Client address	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Client telephone numbers	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Client personnel contact details	Client	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Who contacted from PulseLearning / I Am Here	PulseLearning / I Am Here	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Details of projects (prospective)	PulseLearning / I Am Here	Legitimate Interest	Became Client	As needed	Life of contract term + 6 years	Life of contract term + 20 years	Internal Policy
	Former client data on Dynamics records	Client name	Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years
Client address		Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years	Internal Policy
Client telephone numbers		Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years	Internal Policy
Client personnel contact details		Client	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years	Internal Policy
Who contacted from PulseLearning / I Am Here		PulseLearning / I Am Here	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years	Internal Policy
Details of projects (prospective)		PulseLearning / I Am Here	Legitimate Interest	Became Client	As needed	Date of contract ceased + 6 years	Date of contract ceased + 20 years	Internal Policy
Prospective personnel		Name	Individual	Legitimate Interest	Showed interest	As needed	Min 1 years for interview records, etc.	7 years
	Address	Individual	Legitimate Interest	Showed interest	As needed	Min 1 years for interview records, etc.	7 years	Internal Policy
	Personnel details	Individual	Legitimate Interest	Showed interest	As needed	Min 1 years for interview records, etc.	7 years	Internal Policy
Visitor data on PulseLearning / I Am Here websites	Name	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Email	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Company	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Telephone	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Country	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Query	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	Consent	Individual	Legitimate Interest	Showed interest	As needed	6 years or requested to be removed by individual	7 years or requested to be removed by individual	Internal Policy
	I Am Here Arena	First Name	Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years
Last Name		Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years	Internal Policy
Username		Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years	Internal Policy
Email		Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years	Internal Policy
Company		Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years	Internal Policy
Country		Individual or Client	Legitimate Interest	On Sign up	As needed	2 Years	Date of contract ceased + 2 years	Internal Policy