

GCC BDI DOCUMENT RETENTION POLICY

GCC BDI – OUR COMMITMENT

GCC BDI is committed to ensuring it complies with the laws, regulations and best practices regarding the processing and retention of the personal data of employees, board and committee members, faculty and consultants, and GCC BDI members held by GCC BDI in whatever medium.

GCC BDI is located in the Dubai International Financial Centre (DIFC) and therefore has an obligation under the DIFC Data Protection Law No 5 of 2020 (the DIFC Law), as a data controller, to collect and use personal data in a responsible and accountable manner.

PERSONAL DATA

Personal data is information relating to a natural person who can be identified, directly or indirectly, by the information, including, but not limited to, an identification number, or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

GCC BDI needs to keep documents containing certain personal data about individuals in order to accommodate its business needs i.e. recruit and manage employees, faculty and consultants, manage its membership and its business and monitor performance.

PROCESSING OF PERSONAL DATA

GCC BDI will only process an individual's personal data:

1. With the consent of the person whose personal data is to be held by GCC BDI such consent being obtained at the point of collection of the data.
2. Where processing is necessary for the performance of a contract to which the person providing their personal data is a party.
3. Where processing is necessary for compliance with an applicable law GCC BDI is subject to or by DIFC in accordance with DIFC Law.
4. Where processing is necessary in order to protect the vital interests of the person providing the personal data or of another natural person.
5. For the legitimate interests pursued by GCC BDI or a third party to which the personal data has been made available.

Information as to why and for how long personal data is to be retained should be provided to the person the personal data is collected from at the time of collection.

GCC BDI will ensure that the personal data collected is correct and where necessary kept up to date.

Details of any third party that GCC BDI will be sharing the personal data with should also be provided at the point of collection of the data or as soon as reasonably practical after the personal data has been collected.

RETENTION OF PERSONAL DATA

1. All GCC BDI documents containing personal data should be kept in accordance with the rules set out in this policy.
2. Documents containing personal data should not be kept longer than is necessary for the purpose for which that personal data is used. The retention periods for documents are set out in Appendix 1 to this policy and are subject to the requirements of the data protection laws and regulations in the DIFC and United Arab Emirates. Where GCC BDI needs to retain a document for a longer period than set out for that type of document in the schedule in Appendix 1, information should be kept with the document explaining why the decision was made to retain that document for longer than its retention period. If you have any questions, relating to the retention period for any document, please ask the data controller.
3. Only one copy of each final document should be kept in either paper or electronic format.
4. The individual responsible for creating or maintaining the document, whether in paper or electronic form, is responsible for classifying that document for retention or destruction in accordance with this policy.
5. All documents not required to be kept or are at the end of their retention period must be securely destroyed as soon as possible. This means deleting electronic documents and files and destroying paper documents and files in a manner consistent with the confidentiality of those documents and files, and also deleting any backups. A time will be allocated each month for the destruction of documents and files no longer required.
6. The data controller will notify all employees or others such as faculty or consultants engaged by GCC BDI where documents or files which are due to be destroyed must not be destroyed as that document or file is required for the purposes of fulfilling a legal requirement i.e. a request from law enforcement or a state security body or for the purposes of making or defending a legal claim.
7. To avoid the inference that any document was destroyed in anticipation of a specific legal problem, destruction of any electronic or paper document or file should take place only in compliance with this policy.
8. GCC BDI will treat seriously any destruction of documents or files before the retention period has elapsed and in particular the destruction of any document or file to avoid disclosing data that is subject to a legal requirement.

SHARING OF PERSONAL DATA

Where personal data is to be provided to a third party for instance a health company, bank, or financial academy, this information should also be provided to the individual providing the personal data so that that individual can make an informed consent.

GCC BDI will ensure measures are implemented to minimise the potential risks to the rights of the individual providing the personal data.

GCC BDI will only transfer personal data out of DIFC to a third country with the consent of the individual providing their personal data and where either:

- a) There is an adequate level of protection for that data ensured by applicable law in that country; or
- b) GCC BDI ensures safeguards are put in place by the recipient which are in accordance with the DIFC law.

GCC BDI will not use someone's personal data for marketing purposes or share that data with any third party for their own marketing purposes without the individual's explicit consent.

RIGHTS OF INDIVIDUAL PROVIDING PERSONAL DATA

An individual who has provided personal data to GCC BDI has the right to:

1. Request access to that personal data and to correct it if it is inaccurate or incomplete and to check that the personal data is being used in accordance with the activity it was provided for and in accordance with the DIFC law.
2. Object or withdraw their consent at any time to GCC BDI processing and/or retaining their personal data by notifying the data controller in writing of their objection or withdrawal of consent. The data controller on receipt of the notification will cease the processing or destroy the document/file of personal data as soon as is reasonably practical. Once the processing has been ceased or the personal data destroyed the data controller shall confirm this.

DATA CONTROLLER

The GCC BDI Executive Director is the data controller and as such is responsible for putting in place a system to ensure the protection of personal data collected by GCC BDI and the overall compliance with this policy and the DIFC Law.

The data controller is also responsible for notifying any data breaches to the Commissioner as soon as reasonably practical in accordance with DIFC Law.

COMPLIANTS

Individuals should submit any queries or complaints regarding the use and/or storage of their personal data to the data controller at:

GCC Board Directors Institute

Email: getinvolved@gccbdi.org

Tel: +971 4554 7967

Or via our website www.gccbdi.org Contact Us page:

<https://gccbdi.org/general/?type=CONTACT>

APPENDIX 1 – RETENTION SCHEDULE FOR GCC BDI DOCUMENTS

No.	Type of Document	Retention Period starting point	Dept /person responsible for creating the document	Retention period	Format	Containing personal information	Place of storage
1.	Employee personnel file (employment contract including any amendments, employment related administration forms - sick notes, holiday requests etc.)	End of employment	Accounts & Admin Manager	10 years after departure	Paper and electronic	Yes	Office and file server
2.	Employment applications, CVs and offer letters that have not turned into firm contracts	Date of document	Executive Director and Deputy Executive Director	6 months	Paper and electronic	Yes	Office and file server
3.	Salary records (bonuses, overtime, expenses and benefits)	At the end of the accounting period	Accounts & Admin Manager	6 years after departure	Paper and electronic	Yes	Office and file server
4.	Employee Phone bills (fixed and mobile)	Date of receipt of bill	Accounts & Admin Manager	6 years	Paper and electronic	Yes	Office and file server
5.	Employee travel details for business trips (booking forms for flights, hotels, car etc.	Date of the bill/purchase order	Accounts & Admin Manager	6 years	Paper and electronic	yes	Office and file server
6.	Data related to a temporary worker –	End of contact period	Accounts & Admin Manager	6 years	Paper and electronic	yes	Office and server

	faculty, consultants etc.						
7.	Data related to attendees at conferences, workshops, courses, networking events etc.	From the point the data is collected	Membership and Events Director	20 years or as long as the attendee is still a member	Paper and electronic	Yes	Office and server
8.	Records of assessments, tests and examinations	From the date on which the tests etc. were carried out	Senior Programme Manager	20 years or as long as the attendee is still a member	Paper and electronic	Yes	Office and server
9.	Data concerning GCC BDI members	From the date the data is collected	Membership Director	20 years or as long as the attendee is still a member. 6 years once a member has resigned	Paper and electronic	Yes	Office and server
10.0	Data concerning GCC BDI Board and committee members	From the date the data is collected	Executive Director	20 years	Paper and electronic	Yes	Office and server

GCC BDI Document Control	E.g.	Date
Document Name	Document Retention Policy	
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