

**CRANE PENSION TRUSTEE COMPANY (UK) LTD AND  
CRANE UK GROUP LIFE ASSURANCE SCHEME (THE "SCHEME")****THE GENERAL DATA PROTECTION REGULATIONS ("GDPR")  
POLICY RELATING TO THE RETENTION OF DATA****1. Overview**

The Scheme trustee ("**Trustee**") is required (under the GDPR) to assess the data it holds in relation to Scheme members and to take steps to ensure that data is stored for no longer than necessary.

The assessment which the Trustee is required to carry out should inform the way data is categorised, stored and the period of time it is stored.

The assessment of the Trustee is that all data will be retained for the life of the Scheme unless the Trustee, on advice and on a case-by-case basis, decides that such data may properly be deleted. Under such circumstances, the Trustee reserves the right formally to record the fact that certain data has been deleted.

**Data subjects' rights**

A data subject has the right to have data held in respect of him/ her corrected, modified or, ultimately, erased. The right to have data erased is not an absolute right. This means if the Trustee receives a request to erase data in relation to a data subject, it does not automatically follow that the Trustee must erase it.

**Review process**

Reviews of data will take place during a Retention Period as described below.

- All data will be reviewed where an event occurs which, in the Trustee's opinion, causes a review to be necessary.
- Annually as part of a Trustee meeting.

**2. Expiry**

On the expiry of any Retention Period, the Trustee will conduct a review (or cause one to be conducted) in the same manner as the regular reviews conducted during the Retention Periods referred to in part 4 above. A review undertaken in such circumstances will be a "*final*" review and is expected to result in the data being erased. In **exceptional** circumstances, the Trustee may retain the data being reviewed. Such a decision will need to be evidenced by a written statement which should:

- confirm why the data is being retained; and
- set out the basis on which the data is being retained (that basis will need to include an appropriate reason for retention which accords with the GDPR).

The Trustee should seek legal advice before making a decision to retain data beyond the agreed Retention Period.

### 3. Notes

- a) Any data to be destroyed ought to be destroyed in accordance with the Trustee's Data Destruction Policy.
- b) Data scheduled to be erased will be listed in an erasure notice. A draft erasure notice is attached.
- c) An erasure notice shall be made available to such third parties as the Trustee deems appropriate. The notice is intended to advise those parties of the erasure of data (by the Trustee) and formally to request those parties that, if and to the extent they hold data scheduled for erasure, to erase the same data from their systems.
- d) Third parties who receive an erasure notice are required to respond in writing or electronically. That response should (i) confirm the erasure of like data or (ii) confirm that the third party does not hold like data or (iii) confirm that the third party will retain such data in accordance with its own retention policy.
- e) Where d) (iii) above applies, the third party should provide details of the basis on which it has made its decision to the Trustee. Where the Trustee does not agree with the third party's view, the matter should be referred to an appropriate professional (which may be the legal adviser to the Trustee - however this is not a requirement) for adjudication.