numberone
ACCOUNTING

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Data Retention Policy

1. Purpose and Legal Framework

We retain data only as long as necessary to fulfil purposes, comply with legal obligations, meet HMRC and Companies House requirements, protect business interests, and resolve disputes.

We comply with UK GDPR, Data Protection Act 2018, tax legislation, Companies Act 2006, Money Laundering Regulations 2017, and HMRC requirements.

2. Retention Principles

- Retain only as long as necessary
- Delete or anonymize after retention period
- Retention begins from end of tax year, accounting period, or contract termination
- Regular reviews to identify expired data

3. Retention Periods

Document Type	Retention Period	Legal Basis
Tax & Accounting		
Corporation Tax returns	6 years from accounting period end	HMRC
Self-Assessment returns	6 years (7 if late) from tax year end	HMRC

Annual statutory accounts	Permanent	Companies Act 2006
VAT records	6 years from period end	VAT Act 1994
Management accounts	7 years	Professional standards
Bank statements	7 years	Professional standards
Invoices	6 years from period end	Tax law
Receipts	6 years from period end	Tax law
Capital asset records	6 years after disposal	Capital Gains Tax
Payroll		
Payroll records, P60s, P45s, P11Ds	6 years from tax year end	HMRC
RTI submissions	6 years from tax year end	HMRC
Timesheets	6 years	Employment law
Pension records	6 years from scheme year end	Pensions regulation
Company Records		
Articles of Association	Permanent	Companies Act 2006
Confirmation Statements	Permanent	Companies Act 2006
Directors/shareholders register	Permanent (current) / 10 years (historical)	Companies Act 2006
Board minutes	Permanent	Companies Act 2006
Share certificates	Permanent	Companies Act 2006
AML Records		
Identity documents	5 years from relationship end	MLR 2017
Due diligence records	5 years from relationship end	MLR 2017
Beneficial ownership	5 years from relationship end	MLR 2017
SARs	5 years from report date	MLR 2017
Communications		
Engagement letters	7 years from contract end	Professional standards

Email correspondence	7 years	Professional standards
Meeting notes	7 years	Professional standards
Complaints	7 years from resolution	Professional standards
Marketing & Website		
Consent records	Until withdrawn + 1 year	GDPR
Marketing communications	3 years	Legitimate interest
Analytics data	26 months	GDPR best practice
Contact forms (non-clients)	2 years	Legitimate interest
Cookie consent	1 year	GDPR
Administration		
Our invoices	7 years	Tax law
Insurance policies	Permanent	Professional requirement
Staff records	7 years from employment end	Employment law
Business contracts	7 years from contract end	Contract law

4. Extended Retention

Data may be retained beyond standard periods for legal proceedings, ongoing investigations, unresolved disputes, client requests, or business-critical information.

5. Secure Deletion

Electronic: Permanent deletion from all systems and backups using industry-standard wiping with verification.

Physical: Confidential cross-cut shredding through approved providers with destruction certificates.

Backups: Subject to same retention periods and purged according to rotation schedules.

6. Early Deletion Requests

We can delete if: Data no longer needed, consent withdrawn (where applicable), you successfully object, data unlawfully processed, or deletion required by law.

Cannot delete if: Legal obligation to retain (e.g., tax records), needed for legal claims, necessary for regulatory compliance, or other legal grounds apply.

7. Archiving

Active Records: Regularly accessed in primary systems.
Archived Records: Infrequently accessed in secure storage with restricted access.
Scheduled Deletion: Reviewed annually and deleted when periods expire.

8. Client Access Rights

During retention, you can request copies, corrections, explanations, or object to processing (subject to legal grounds).

9. Contact

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