This is the Data Retention Policy for



Clavering House, Clavering Place, Newcastle Upon Tyne, NE1 3NG.

- 1. We do not keep data for longer than necessary.
- We will keep securely a record of all received cases by data, Client name, Subject name and information requested for a maximum of six (6) years unless instructed by the Client to do otherwise. If it is electronic data then it is erased or if it is a hard copy then it is shredded.
- 3. If the case is a trace and if it is a "positive" trace then we will keep securely a copy of the instruction from our client and a copy of our encrypted report to a client for a minimum of six (6) months or less / longer if explicit written instruction to do so is received from our client or any agency of the law. If it is electronic data then it is erased or if it is a hard copy then it is shredded.
- 4. If the case is a trace and it is a "negative" trace then we will keep securely a copy of the instruction from our client and a copy of our report for a minimum of twenty-eight (28) days, or less / longer if explicit written instruction to do so is received from our client or any agency of the law. If it is electronic data then it is erased or if it is a hard copy then it is shredded.
- 5. If the case is an intelligence report, due diligence report, investigatory / surveillance report or any such similar report then we will keep securely a copy of the originating instruction, a copy of the encrypted report and accompanying supplementary evidence (photographs, video files, etc.) for six (6) months, or less / longer if explicit written instruction to do so is received from our client or any agency of the law. If it is electronic data then it is erased or if it is a hard copy then it is shredded.
- If the case is a Process Serve or affiliated matter then we will keep securely a copy of the instruction
 from our client and a copy of our report / witness statement / certificate of service for a minimum of
 six (6) years unless instructed by the client or any agency of the law to do otherwise. If it is electronic
 data then it is erased or if it is a hard copy then it is shredded.

Signed:

Director - Surmount Investigations

Dated: 17th May 2018

