



NEW ALTERNATIVE PATH  
YOUR STEPPING STONE TO SUCCESS

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## Data Retention and Disposal Policy

New Alternative Path is committed to Integrity, Fairness & Student-Centered Values

**Effective Date: 20th March 2025**

**Approved by: Ayshe Sivri**

**Version: 1.0**

### 1. Purpose

This policy aims to guarantee that all data held by New Alternative Path is kept only for the necessary duration, adhering to legal, operational, and contractual obligations, and that any data no longer required is disposed of securely.

### 2. Scope

This policy applies to all physical and digital data held by the consultancy, including:

- Student personal and academic data
- Employee records
- Financial and transactional data
- Communications (email, chat, calls)
- Application and visa support documents

### 3. Data Categories and Retention Periods

Data Type	Retention Period	Justification
Student records (applications, CVs, academic history)	7 years from last contact	Legal and audit obligations
Employee records	6 years after termination	Employment law and reference purposes



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Data Type	Retention Period	Justification
Financial records and invoices	7 years	Tax and accounting compliance
Email communications	2 years	Operational relevance
Website user data (cookies, forms)	1 year (or per consent duration)	Consent-based processing
CCTV footage (if applicable)	30 days unless required for investigation	Security purpose only

#### 4. Data Storage and Access

- All data is stored securely using encrypted servers and password-protected systems.
- Physical records are kept in locked filing cabinets with restricted access.
- Only authorized personnel may access sensitive or personal data.

#### 5. Data Disposal Procedures

##### a. Digital Data

- Deleted using secure methods (e.g., data wiping or overwriting).
- Backup data also deleted where applicable.
- Devices no longer in use are wiped clean before reuse or disposal.

##### b. Physical Data

- Shredded using cross-cut shredders.
- Sensitive documents must never be disposed of in general waste.
- Disposal must be logged, especially for student or financial records.

#### 6. Roles and Responsibilities



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- **Operations Manager:** Oversees data retention practices and disposal processes.
- **All Staff:** Follow policy requirements and report any improper data handling.

## 7. Legal and Regulatory Compliance

This policy complies with:

- General Data Protection Regulation (GDPR) – where applicable
- Local data protection laws and education sector regulations
- Contractual obligations with partners and service providers

## 8. Data Subject Requests

If a data subject requests deletion (right to be forgotten), we will:

- Verify the identity of the requester
- Assess whether data must be retained under any legal obligation
- If eligible, securely delete or anonymize the data within 30 days

## 9. Policy Review and Updates

This policy is reviewed annually or whenever there are significant changes to:

- Legal requirements
- Technology and data storage solutions
- Organizational processes