



BENDER DATING LIMITED

RETENTION AND DISPOSAL POLICY (App and Website personal data)

1. Introduction

This is the retention and disposal policy of Bender Dating Limited ("Bender Dating", "us" or "we"), which applies to records we hold containing or relating to personal data obtained and processed in connection with the use of our app or website.

When we refer to personal data in this policy, this means any information about an individual from which that person can be identified. For more information about personal data and how we use it, please see our [Privacy Policy](#).

2. About this policy

This policy sets out:

- the general timescales for which we will retain relevant records;
- requirements for the disposal of relevant records.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, please contact our Data Protection Officer using the contact details set out in section 9.

This version of the retention and disposal policy is effective as of **17 July 2021**.

3. Changes to this policy

We reserve the right to amend this policy at our sole discretion, without prior notice to you. However, this does not affect your applicable rights as set out in our [Privacy Policy](#).

4. Records covered by this policy

This policy applies only to personal data obtained and processed in connection with the use of our app or website. We have a separate policy covering the retention and disposal of personal data relating to our employees and contractors. Other records (not relating to personal data) are covered by other policies.

Unless otherwise specified, this policy refers to both paper records and electronic (or 'soft copy') records.

5. How long we will keep relevant records

Records will ordinarily only be kept for as long as is necessary for the purposes for which the relevant personal data is to be used, as set out in our [Privacy Policy](#). However, the retention period may be longer:

- in accordance with any applicable provisions of our [Privacy Policy](#); or
- if permitted or required by legal and regulatory requirements.

The Record Retention Schedule below sets out the applicable retention periods we normally apply to relevant records.

6. Review

Notwithstanding the Record Retention Schedule below, our Data Protection Officer will from time to time review the retention periods for records or different categories of information and will determine whether they should be destroyed or retained for a further period, having regard to applicable legal and regulatory requirements or the provisions of our [Privacy Policy](#).

7. Destruction of records

Relevant records will be destroyed in the following ways:

- records held in paper format will be cross-cut shredded and pulped or burnt;
- electronic or 'soft-copy' records will be destroyed using means appropriate to render them non-recoverable;
- where applicable, individual folders will be permanently deleted from the system; and
- electronic equipment which is disposed of which contains relevant records will be destroyed after first using killdisk (or similar) to permanently erase the relevant records.

8. Records of destructions

We will not be obliged to document the disposal of records when doing so in accordance with the Record Retention Schedule.

Where we dispose of relevant records other than in accordance with the Record Retention Schedule (either by being disposed of earlier or kept for longer than listed), we will ordinarily document such disposal for audit purposes (but without referring to any identifiable individual to which the records related).

9. Contacting us

If you have any questions about this policy, please contact us by:

- writing to us at:
Data Protection Officer
Bender Dating Limited
Westgate House
Seedhill
Paisley

Renfrewshire
PA1 1JE
Scotland

or:

- emailing our Data Protection Officer by sending an email to: feedback@benderdating.com.

Record Retention Schedule

Description	Retention Period	Comments/Relevant Legislation
General enquiries records (where no contract is entered into/no app registration occurs)	1 year after the last date of enquiry (or relevant longer period where information is used for legitimate purposes or with consent)	
Contracts/app registration records (including enquiries made and all associated correspondence, including details of complaints about, or from, other users)	7 years after termination of the contract/app registration or activities undertaken in connection with contracts/use of the app (whichever is longer)	Limitation Act 1980 Where any such records or correspondence relates to disputes or legal proceedings, or is needed to comply with a legal obligation or for the exercise or defence of legal claims, such data will be held for the relevant period set out below.
Profile entries for app users (including photographs)	7 years after termination of the contract/app registration or activities undertaken in connection with contracts/use of the app (whichever is longer)	Limitation Act 1980 Where any such records relate to complaints, disputes or legal proceedings, or is needed to comply with a legal obligation or for the exercise or defence of legal claims, such data will be held for the relevant period set out below.
Chat/messaging content for app users (including attachments/images)	7 years from the date of posting/transmission of the relevant chat/content	Limitation Act 1980 Where any such records relate to complaints, disputes or legal proceedings, or is needed to comply with a legal obligation or for the exercise or defence of legal claims, such data will be held for the relevant period set out below.

Description	Retention Period	Comments/Relevant Legislation
Location services data	7 years from the date of creation of the relevant data	<p>Limitation Act 1980</p> <p>Where any such data relates to complaints, disputes or legal proceedings, or is needed to comply with a legal obligation or for the exercise or defence of legal claims, such data will be held for the relevant period set out below.</p>
Records relating to disputes or legal proceedings	7 years from the date on which the dispute arose or legal proceedings were threatened/ contemplated/ issued/ concluded (whichever is longer)	Limitation Act 1980
Records required for compliance with a legal obligation	For as long as required by the applicable obligation (if longer than any applicable period above).	