



Data and Document Retention Policy

Adopted on 24th May 2018

Overview of Retention Policy

It is the policy of RTÉ to:

- retain Personal Data, documentation and information only for a finite period unless otherwise required by law;
- store Personal Data, documentation and information in a secure manner with appropriate security measures in place; and
- delete and erase Personal Data, documentation and information held in other forms in a confidential and secure manner once it is no longer relevant to the purpose for which it was obtained.

PART 1

1. Introduction

This is the data and document Retention Policy (the “**Retention Policy**”) of Raidió Teilifís Éireann, RTÉ Commercial Enterprises DAC, and any of their affiliates, including 2RN (together “**RTÉ**”). This Retention Policy forms part of RTÉ’s General Data Protection Regulation (“**GDPR**”) compliance project. The purpose of this Retention Policy is to outline RTÉ’s policy concerning the retention and destruction of Personal Data (i.e. information from which a living individual can be identified), documents, records, files, audio visual samples and recordings and any other forms of information and records regardless of the media in which they are stored (together referred to as “**Data**”).

2. Types of Documents

This Retention Policy applies to any type of Data created, received or transmitted in the context of RTÉ’s operations, regardless of the format. Such Data may, for example, include:

- **Hard copy files**
Letters to and from RTÉ and other correspondence; contracts; handwritten notes; and performance reviews.
- **Audio and video files**
Audio and video recordings; information obtained from journalistic sources in other media; and voicemails.
- **Digital data**
Electronic files; emails, attachments, databases and documents in electronic form such as excel sheets; and slide shows.
- **Online postings**
Such as on rte.ie.

Therefore, any paper records and electronic files that are part of any of the categories listed in the Records Retention Schedule contained in the Appendix to this Policy, must be retained for

the amount of time indicated in the Records Retention Schedule. Data should not be retained beyond the period indicated in the Records Retention Schedule, unless a valid business reason (or a litigation hold or other special situation) calls for its continued retention. If you are unsure whether to retain a certain record, please contact your supervisor or dpo@rte.ie.

3. **How to Store Data**

RTÉ's records must be stored in an appropriate manner, and where required, in safe, secure and accessible means. Special care should be taken to ensure that information of a sensitive nature, in particular, information obtained from journalistic sources, is stored in a secure manner which may include, for example, locked filing cabinets and offices for hard copy Data and/or the use of password protection and encryption for Data stored in electronic form.

4. **How to Destroy Data**

Once Data have met their required retention period, as specified in the Records Retention Schedule in the Appendix, such Data should then be deleted or destroyed as follows:

- **Hard copy files:** to be destroyed by confidential shredding.
- **Digital copy files:** to be purged or deleted from all relevant systems on which such as Data is stored and/or data bases in conjunction with the Technology Division.
- **Data stored in other media:** to be destroyed in a safe and confidential manner to ensure the content is not disclosed.

5. **Litigation Holds and Other Special Situations**

- **What is a Litigation Hold?**

RTÉ requires all employees to fully comply with the general guidance set out in this Policy and the specific retention periods set out in the Records Retention Schedule. However, all employees should note the following general exception to any stated destruction schedule: if you believe, or the Solicitors' Office informs you, that certain Data held by RTÉ is relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit or other event, you must preserve and not delete, dispose, destroy or change such Data, including e-mails, until the Solicitors' Office determines that such Data is no longer needed. This exception is referred to as a "**Litigation Hold**", and takes priority over any previously or subsequently established destruction schedule for those records. If you believe this exception may apply, or have any questions regarding whether it may possibly apply, please contact your supervisor or the RTÉ Solicitors' Office.

- **What to do when notified of a Litigation Hold?**

The destruction of Data must stop immediately upon notification from the Solicitors' Office that a litigation hold is to begin because RTÉ may be involved in litigation or an official investigation. Destruction may begin again once the Solicitors' Office has confirmed that the relevant litigation hold has been lifted.

6. **Mandatory Compliance and Employee Questions**

- **Responsibility of All Employees**

It is the responsibility of all RTÉ employees to comply with this Policy, the Records Retention Schedule and any litigation hold communications. Failure to do so may

subject RTÉ, its employees and contract staff to legal liability. An employee's failure to comply with this Policy may result in disciplinary sanctions, including suspension or termination. It is the particular responsibility of each Area/Unit head to ensure compliance with this Policy within the relevant Area/Unit.

- **Reporting Policy Violations**

RTÉ is committed to enforcing this Policy as it applies to all forms of records. The effectiveness of RTÉ's efforts, however, depends largely on employees. If you feel that you or someone else may have violated this Policy, you should report the incident to your supervisor.

- **Questions about the Policy**

Any questions about this Policy should be referred to your supervisor or dpo@rte.ie.

PART 2 - RETENTION PERIODS

As part of the RTÉ’s GDPR compliance project, and having regard to Article 24 of the GDPR (and in particular the nature, scope, context, purposes and the risks arising in the context of the data processing undertaken by RTÉ), as well the principles of ‘storage limitation’ and ‘data minimisation’ contained in Article 5 of the GDPR, RTÉ has adopted the four general data retention periods set out in the table below. The Appendix contains a detailed analysis of the various statutory retention requirements which supports this approach:

<i>Type of Data</i>	<i>Retention Period</i>	<i>Criteria</i>	<i>Examples</i>
1. Disposable Information	None. Can be deleted / destroyed immediately. Should not be retained for any longer than its purpose.	Data, information and documentation that is not required for a permanent record but that only serves a temporary purpose.	<ul style="list-style-type: none"> • Initial drafts of emails, letters, reports, etc. and working notes. • Publicly available materials used for reference (such as from books, internet sources, magazines, etc.). • Spam and junk email. • Correspondence unrelated to work.
2. Transitory Information	3 years after the relevant event (for example, after the relevant work or leave period to which the record relates).	Data, information and documentation which is relevant for a finite period of time but that is no longer relevant a period of time after the relevant event.	<ul style="list-style-type: none"> • Day to day routine internal correspondence.
3. Non-Transitory Information	8 years after the relevant event (for example, the end of the employment relationship or the end of the contract).	Data, information and documentation which should be retained for a longer period as part of a file. A key identifier of Non-Transitory Information is that it should be retained in case a legal claim arises.	<ul style="list-style-type: none"> • Personnel files. • Leave records. • Contracts. • Tenders.
4. Indefinite Retention	After 8 years : <ul style="list-style-type: none"> • To be archived; or • Retained in accordance with specific legislative retention period. 	Legal requirement to retain indefinitely or permanently or required to be retained as part of the official RTE archive.	<ul style="list-style-type: none"> • Board minutes. • Pensions and benefits records. • Broadcast material. • Vetting and Child Protection.

APPENDIX

RECORD RETENTION SCHEDULE

From time to time RTÉ establishes retention or destruction schedules or procedures for specific categories of records. This is done to ensure legal compliance and accomplish other objectives, such as protecting intellectual property and controlling storage, IT and related costs. The following Records Retention Schedule (the “**Retention Schedule**”) is to be used as a reference guide for document retention periods under Irish law as applicable and in force on ● May 2018. Please note that this is not an exhaustive list of records and information required to be retained under Irish law and that legal document retention requirements are subject to change and should be subject to periodic review.

This Records Retention Schedule (the “**Retention Schedule**”) contains the following sections:

1. HR records/files.
2. Broadcast content.
3. Customer Relationship Management and Service Providers.
4. RTÉ Website, Social Media and Applications.
5. Other categories.

Section 1 – Human Resources

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
A. Recruitment records/files					
<p>Recruitment applications of unsuccessful applicants:</p> <ul style="list-style-type: none"> • interview records; • marking sheets; and • unsolicited job applications. 	<p>PeopleSoft, Candidate Manager, hardcopy, softcopy (emails, files etc. various drives & locations); and</p> <p>Hardcopy, Softcopy (emails, files etc.).</p>	<p>Transitory: 3 years from date of relevant event.</p>	<p>Purge data in Candidate Manager & PeopleSoft.</p> <p>Destroy any hardcopy data by confidential shredding.</p> <p>Purge any softcopy records.</p>	<ul style="list-style-type: none"> • Employment Equality Acts, 1998-2015. • Freedom of Information Act 2014. <p>Comment: Section 76 of the Employment Equality Acts 1998-2015 requires that employees may seek certain information. The holder of the information can refuse to provide it but an adverse inference could be drawn on the basis of this refusal at a later point. Claims can be brought within an initial period of six months, although this can be extended to 12 months in certain circumstances. A period of 18 months adequately meets this requirement and provides a reasonable period of time to provide Reasons for Decisions under section 18 of the Freedom of Information Act 2014.</p>	<p>All HR</p>
<p>Recruitment – Board Reports</p>	<p>Hardcopy & Softcopy.</p>	<p>Indefinite Retention.</p>	<p>Archive after 8 years.</p>	<p>To the extent that these reports do not contain specific personal data they can be retained indefinitely.</p>	<p>HR</p>

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
B. Employee Personnel Files					
<p>Employees files:</p> <p><i>To include:</i> personnel and training records, written particulars of employment, contracts of employment and changes to terms and conditions.</p> <p>Note: in respect of pension data for pensionable employees see Pension Data below.</p>	<p>PeopleSoft, HR Direct, Candidate Manager. Hardcopy & Softcopy (emails, files etc. various drives & locations).</p>	<p>Indefinite Retention:</p> <p>For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12 years thereafter</p> <p>Non-Transitory:</p> <p>For Non Pensionable Employees – 8 years after employment ceases.</p>	<p>Destroy hardcopy file by confidential shredding.</p> <p>Purge record in PeopleSoft, HR Direct & Candidate Manager.</p> <p>Purge any other softcopy records.</p>	<ul style="list-style-type: none"> • Statute of Limitations Act 1957 (as amended). <p>Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.</p>	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Probation data	PeopleSoft, Hardcopy & Softcopy, (emails, files etc.).	<p>Indefinite Retention:</p> <p>For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12 years thereafter</p> <p>Non-Transitory:</p> <p>For Non Pensionable Employees 8 years after employment ceases.</p>	<p>Destroy hardcopy file by confidential shredding.</p> <p>Purge record in PeopleSoft & HR Direct.</p> <p>Purge any other softcopy records.</p>	<ul style="list-style-type: none"> Statute of Limitations Act 1957 (as amended). <p>Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.</p>	
Parental Leave and Paternity Leave Records	PeopleSoft, HR Direct, Hardcopy & Softcopy (emails, files etc.).	<p>Indefinite Retention</p> <p>For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12</p>	<p>Destroy hardcopy file by confidential shredding. Purge record in PeopleSoft & HR Direct.</p> <p>Purge any other softcopy records.</p>	Section 17 of the Paternity Leave and Benefits Act 2016.	
Force Majeure				Section 27 of the Parental Leave Act 1998.	
Carer's Leave				Section 27(2) of the Parental Leave Acts 1998.	
				Section 31 of the Carer's Leave Act 2001.	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
		years thereafter Non-Transitory: For Non Pensionable Employees – 8 years after employment ceases.			
Sick Leave records & Pre-Employment Medicals Other Absences	PeopleSoft, Hardcopy & Softcopy (emails, files etc.).	Indefinite Retention For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12 years thereafter Non-Transitory: For Non Pensionable Employees – 8 years after employment ceases.	Destroy by confidential shredding/delete record in PeopleSoft. Purge any other softcopy records.	<ul style="list-style-type: none"> • Statute of Limitations Act 1957 (as amended). Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Annual Leave Records	PeopleSoft.	Transitory: 3 years from the statutory annual leave year-end (1 April to 31 March) in which the annual leave was taken.	Archive after 4 years. Purge records in the new HR system which has been tendered for.	Section 25 of the Organisation of Working Time Act 1997.	
Records to show compliance with the Organisation of Working Time Act 1997 and the Organisation of Working Time (Records) (Prescribed Form and Exemptions) Regulations 2001	●	Indefinite Retention For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12 years thereafter Non-Transitory: For Non Pensionable Employees – 8 years after employment ceases.	●	Section 25, Organisation of Working Time Act 1997. Organisation of Working Time (Records) (Prescribed Form and Exemptions) Regulations 2001.	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Maternity records		<p>Indefinite Retention</p> <p>For Pensionable Employees - for so long as the employee (or dependants) remains entitled to pension benefits and for a minimum of 12 years thereafter</p> <p>Non-Transitory:</p> <p>For Non Pensionable Employees –8 years after employment ceases.</p>		<ul style="list-style-type: none"> • Statute of Limitations Act 1957 (as amended). <p>Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.</p>	
Consents for the processing of personal and sensitive data		<p>Non-Transitory: 8 years after the data was last processed.</p>		<ul style="list-style-type: none"> • Statute of Limitations Act 1957 (as amended). <p>Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.</p>	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Work permits/visa information		Non-Transitory: 8 years from the date of the permit and as long as the worker continues in such employment.		Section 27 of the Employment Permits Act 2006.	
C. Payment/Salary information					
Employee Bank details		Transitory: 3 years after employment ends.		Best practice.	
Payroll and wage records for companies (including records relating to the reimbursement of employee expenses)	●	Non-Transitory: 8 years from the financial year-end in which payments were made.	●	Section 22, National Minimum Wage Act 2000.	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
PAYE records		Non-Transitory: 8 years after the end of the tax year to which they relate.		Section 886 of the Taxes Consolidation Act 1997 (the "TCA"). Part 5, Revenue Employer's Guide to PAYE.	
D. Non-Employee Data					
Non Employee Files	PeopleSoft, HR Direct, hardcopy & Softcopy (emails, files etc.).	Non-Transitory: 8 years after the end of the engagement.	Destroy by confidential shredding/delete record in PeopleSoft & HR Direct. Purge any other softcopy records.	<ul style="list-style-type: none"> Statute of Limitations Act 1957 (as amended) Comment: Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.	
Fees Data (Non Employees)	PeopleSoft.	Non-Transitory: 8 years after employment ends.	Archive in PeopleSoft after 2 years. Purge after 8 years after employment.		

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
E. Pension Data					
<p>Employees (pensionable):</p> <p><i>Includes:</i> (1) Contract of employment including any related amendments, staff handbooks, collective agreements or other employment policies and/or union agreements and any other changes to terms and conditions of employment in so far as they relate to pension matters.</p> <p>(2) Payroll records in so far as they relate to the remittance of</p>	<p>PeopleSoft, HR Direct, Candidate Manager. Hardcopy & Softcopy (emails, files etc. various drives & locations).</p>	<p>Indefinite Retention: Maintained for so long as the member (or dependants) remains entitled to benefits under the scheme and for a minimum of 12 years thereafter.</p>	<p>Destroy hardcopy file by confidential shredding. Purge record in PeopleSoft.</p> <p>Purge any other softcopy records.</p>	<p>Comment: While there is no regulatory requirement to retain documents in relation to a pension scheme for a specified period of time, best practice would dictate (and the Pensions Authority would expect) that adequate records are retained until the liabilities in relation to an individual member or the scheme in general are discharged and, following this, for the statutory period set out in the Statute of Limitations Act 1957 (as amended), which is currently 12 years.</p>	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
contributions or premiums to the pension scheme on an employee's behalf and/or any refunds of contributions.					
Employee Superannuation/ pension/ retirement records: <i>Includes:</i> information relating to individual members (and dependants) and any attendant benefits (e.g. pension renewal information and AVCs)	PeopleSoft Hardcopy & Softcopy.	Indefinite Retention: Maintained for so long as the member (or dependants) remains entitled to benefits under the scheme and for a minimum of 12 years thereafter.	Destroy hardcopy file by confidential shredding. Purge record in PeopleSoft. Purge any other softcopy records.	See comment above.	
Pension Scheme Details and Accounts:	Hardcopy & Softcopy.	Indefinite Retention: Should be retained for the duration of the	Destroy hardcopy file by confidential shredding. Purge any	See comment above.	

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
<p><i>Includes:</i> (1) trust deed, rules and any amendments and trustee meeting minutes relating to each pension scheme;</p> <p>(2) Audited accounts, investment records, actuarial valuations and all other financial records.</p>		pension scheme and a minimum of 12 years after the winding up of the scheme.	other softcopy records.		
F. Human Resource policy documents & Industrial Relations					
HR Policies	Hardcopy, softcopy & the HUB.	Indefinite Retention.	Archive after 8 years.	Legal case management.	HR
Industrial Relations Files Issues,	Softy copy & hard copy-various HR locations.	Indefinite Retention.	Archive after 8 years.	Cases and law.	HR

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Correspondence					
Industrial Relations Agreements	Hard Copy and softcopy – various locations.	Indefinite Retention.	Archive after 8 years.	Cases and Law.	HR
Case Management IRT Recommendation/ Labour Court/ WRC adjudication/MDT	Hard Copy and softcopy – various locations.	Indefinite Retention.	Archive after 8 years.	Cases and law.	HR
Disciplinary & Grievances data	Hard Copy and softcopy – various locations.	Non-Transitory: 8 years after employment ends.		May be required for the defence of legal cases. Under the Statute of Limitations Acts 1957, a claim for breach of contract can be brought up to six years after the occurrence of the breach of contract and any action must be served within 12 months.	HR

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
PHI/ Salary Protection	PeopleSoft, hardcopy and softcopy – various locations.	Indefinite Retention: Maintained for so long as the member (or dependants) remains entitled to benefits under the scheme and for a minimum of 12 years thereafter.	Destroy hardcopy file by confidential shredding. Purge record in PeopleSoft. Purge any other softcopy records.	Comment: There can be ongoing issues with this.	HR
HR Policies	Hardcopy, softcopy & the HUB.	Indefinite Retention.	Archive after 8 years.	Legal case management.	HR
G. Health & Safety					
Incidents & Accidents	PeopleSoft, hardcopy and softcopy – various locations.	Indefinite Retention: Retain for at least 10 years after the date of the incident.	Archive after 8 years.	Safety, Health and Welfare at Work Act 2005 (as amended); Safety, Health and Welfare at Work (General Application) Regulations 2007	Andrew Dunne
Risk Assessments	Hardcopy and softcopy – various	Indefinite Retention: Retain for at least 10	Archive after 8 years.	Safety, Health and Welfare at Work Act 2005 (as amended); Safety, Health and Welfare at Work	Andrew Dunne

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
	locations.	years.		(General Application) Regulations 2007	
RTÉ Project Safety Files (Creche, New Entrance, Fair City Lot, Galway IT move)	Hardcopy and softcopy – various locations.	Indefinite Retention.	Archive after 8 years.		Andrew Dunne
Child Protection	Hardcopy and softcopy – various locations.	Indefinite Retention.	Archive after 8 years.	The Children First; National Guidance for the protection and Welfare of Children, section 5.21,5.21.1 Record keeping page 41 and 42 state no minimum or maximum period.	Andrew Dunne
Garda Vetting disclosure (and application materials)	Hardcopy and softcopy – various locations.	Indefinite Retention.	Archive after 8 years.	Section 12 of the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016 requires relevant organisations to obtain vetting disclosures.	Andrew Dunne

Section 2 – Broadcast and Journalistic Materials

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
2. Broadcasting Material, Sources, Financing and Research Materials					
Video footage and audio recordings of all Broadcast Content	Hard copies and Digital Copy Files (RTÉ G-Drive).	Indefinite Retention	Archive after 8 years	<p>Section 114(1)(e) of the Broadcasting Act 2009 states that one of RTÉ’s objects is “<i>to establish and maintain archives and libraries containing materials relevant to the objects of RTÉ</i>”.</p> <p>Section 11(1)(c) of the Statute of Limitations provides that the statute of limitations for a defamation action is 12 months (extendable to 24 months) from the date of the cause if accrual of the action (i.e. the publication of the allegedly defamatory statement).</p>	RTÉ News & Current Affairs, RTÉ Archives and Content
Video and audio recordings, rushes & outtakes, research and journalistic materials used in preparation of documentaries and	Hard copies, handwritten notes, RTÉ G-Drive (electronic copies).	Indefinite Retention.	Archive after 8 years	<p>Section 114(1)(e) of the Broadcasting Act 2009 states that one of RTÉ’s objects is “<i>to establish and maintain archives and libraries containing materials relevant to the objects of RTÉ</i>”.</p> <p>Section 11(1)(c) of the Statute of Limitations provides that the statute of</p>	RTÉ News & Current Affairs & Archives Content

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
other programmes				limitations for a defamation action is 12 months (extendable to 24 months) from the date of the cause if accrual of the action (i.e. the publication of the allegedly defamatory statement).	
Details of audience guests	Computer files, handwritten notes	3 years from the collection of the data or the last time that the guest attended an RTÉ show as an audience guest. ¹			
Details of individuals who feature in Programmes or news items or features, Cast Lists, Casting Tapes	Computer files, hard copies and handwritten notes.	Indefinite Retention	Archive after 8 years.	Article 5 GDPR.	RTÉ News & Current Affairs, Content & Archives
Programme Underlying Rights Agreements including Writer	Hard copies and electronic copies on G Drive	Indefinite Retention: For as long as the broadcast footage is to		Article 5 GDPR . Keep as legal record of programme	RTÉ News & Current Affairs Content AND

¹ **Comment:** Audience guests are told their personal data will be retained for a period of 3 years.

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Agreements, signed Release Forms/ Contributor Agreements, Talent Agreements, Access Agreements and Location Agreements, co-production and financing agreement, etc		be used by RTÉ.		rights and consent to broadcast. Section 114(1)(e) of the Broadcasting Act 2009 states that one of RTÉ's objects is <i>"to establish and maintain archives and libraries containing materials relevant to the objects of RTÉ"</i> .	Archives
Programme Finance Documentation (including budgets, quotes, final accounts etc which may contain personal data)	Hard copies and electronic copies on G-Drive Digital Copy Files	Non-Transitory: 10 years from the financial year-end in which programme was made.	Destroy hardcopy file by confidential shredding. Purge any other softcopy records.	RTÉ has legitimate interest in retaining for business and/or re-use value for up to 10 years	Finance (Independent Productions Finance Unit)
Pitches, Programme Proposals/Submissions, Email	Digital Copy Files and on RTE E-Commissioning System	Indefinite Retention	Archive after 8 years.	Article 5 GDPR. (TV Legal Services note – Legitimate interest in defence of possible claims of copyright infringement (e.g., legal value)	Content & Finance (Independent Productions Finance Unit)

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILT Y
Enquiries					

Section 3 – Customer Relationship Management and Service Providers

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Customer Relationship Management and Service Provider Data					
Personal Data contained in tender documents received by RTÉ.	Hard copy, computers files.	Non-Transitory: 8 years after end of tender process.		Statute of Limitations 1957 (as amended).	RTÉ Procurement Department
Personal Data related to sending invites to clients, stake holders and business contacts and sales proposals.	Microsoft CRM system.	Transitory: 3 years from the date of the last contact/invitation.		Article 5 GDPR.	

Section 4 – RTÉ Website, Social Media and Applications

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
4. RTÉ Website, Social Media and Applications					
Details of Competition Entries					
Details of online purchases including payment details		Transitory: 12 months from date of the relevant transaction.		Guidance from Office of the Data Protection Commissioner.	
Details collected and used in connection with RTÉ sign-in service (including IP addresses)		For as long as the user is registered to the service.			
Device data used for Personalised Digital Content and Online Advertising		For as long as the user is registered to use the service.			

Section 5 – Others

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
4. LIBRARY SALES					
Contact Details (Email Address, Phone Number) Of Customers And Record Of Transaction	Digital Files				Library Sales
Details Of Purchases Including Payment Details For The Above	Digital Files	Currently Stored Until End Of Financial Year In Which The Transaction Occurred			Library Sales
Legal Files	Solicitors Office	Indefinite Retention		Article 6 – GDPR	RTÉ Solicitors' Office

TYPE OF DATA	SOURCE / WHERE HELD (SYSTEMS ETC.)	RETENTION PERIOD	INSTRUCTIONS ON EXPIRATION OF RETENTION PERIOD	STATUTORY REFERENCE / JUSTIFICATION	RESPONSIBILITY
Records for General Accounting, budgeting, planning and administration.	Finance	Indefinite Retention		Statutory functions under Broadcasting Act	Finance