

Five by Five & Dragonfish are both subsidiary companies & branded trading names of Lawton Communications Group Ltd
Registered as a Company in England and Wales ~ Company No: 09475580 & VAT No: GB 412 0891 82

Lawton Communications Group Data Retention & Deletion Policy

How long do we keep your data for and when & how do we delete it?

This purpose of this policy is to ensure that Lawton Communications Group Ltd and its subsidiaries [hereafter LCG] give you clear information on how long data and documentation is retained for. This policy is intended to aid both Customers and Staff of LCG.

Throughout this document when you see the words 'us', 'we' and 'our' this is referring to LCG.

We are a limited company, registered in England and our Company Registration Number is 09475580 and our registered office is 4 Grosvenor Square, Southampton, Hampshire SO15 2BE. All additional subsidiary Company Information is contained in the final page.

Our Group ICO Data Controller registration number is: ZA283779 and the registration numbers for our subsidiaries are Z5736953 & ZA283464

We operate a group of Global Marketing & Advertising Agencies and Consulting Companies. We collect personal data to allow us to maintain our own records and accounts and to support our staff in the furtherance of all business processes.

If you have any questions regarding data retention you should make contact with our Data Protection Officer using the company details above.

Administration

LCG collects Personal Data to carry on about our business. The administration of this data is overseen by the directors of LCG. Any data collected will only be used for the purpose it was gathered for.

Suspension of Record Disposal

There may be certain occasions where information needs to be preserved beyond the limits set out in this policy. These situations may include, but are not limited to:

- Legal proceedings or a regulatory (or similar) investigation
- A crime is suspected or detected
- Information is relevant to a company in liquidation where a debt is due to LCG

The Data Protection officer will take immediate steps to promptly inform all affected parties if a suspension retention occurs.

Data Categories and Retention Schedule

| Data Record Type | Nominal Retention Period | Narrative |
|-------------------------|---------------------------------|---|
| Email & Correspondence | 7 years | This is in-line with record keeping guidelines provided by HMRC. We keep emails to prove work carried out happened or to refer to in case of any disagreement over instructions given or received. There is the possibility that some emails are kept for more than 7 years if a staff member is employed beyond that length of time as their archive will not be purged until they leave our employment. |
| Project Files | 7 years | This is in-line with record keeping guidelines provided by HRMC. We keep project file paperwork to prove work was carried out happened and sign-off authorisation occurred on proof prints and sample products. We manually delete file, prints and products older than 7 years. |
| Financial Information | 7 years | We hold paper financial records for 7 years in-line with HMRC guidelines. We have them manually destroyed by using a Secure Shredding Company at the end of the retention period. |
| Website submissions | 3 months | Data submitted to us via any contact form via our Group websites is retained for no longer than 3 months. After this period of time, the entries are automatically deleted. |
| Employee Details | 7 years | We keep details of ex-staff members for 7 years. We do this in case we need to provide references for ex-employees moving on to new jobs, or if we need to provide HMRC with details of any previous payment or tax history. |
| Corporate Records | Permanent | Our corporate records are permanently retained on the Companies House website |

LCG Subsidiary Information

Lawton Communications Group Ltd is Registered as a Company in England and Wales at the Southampton address below.

Company No: 09475580 & VAT No: GB 412 0891 82

Subsidiaries of Lawton Communications Group Ltd are:

Dragonfish Consulting Ltd ~ Company No: 08971418

Five by Five Ltd ~ Company No: 01444820

FbF Global Pty Ltd ~ ABN: 28607058015

Five by Five Digital LLC ~ Reg'd in California
Company Registration Number: 201022410041

LLC is a subsidiary of Lawton Communications Group Inc
Inc Company filed in Delaware ~ Company Number: 383644222

LCG Office Locations

4 & 5 Grosvenor Square
Southampton SO15 2BE
+44 (0)23 8082 8500

3415 S. Sepulveda Blvd
Los Angeles CA 90034
+1 (310) 300 4848

6/50 Reservoir Street
Sydney NSW 2010
+61 (0)2 8007 6474

22 Upper Ground
London SE1 9PD
+44 (0)20 3556 3664