



London Cycle Hire Scheme

Schedule 2

Common Statement of Requirements

Appendix 2 - Data Retention

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1 Overview

- 1.1.1 This document sets out the retention periods for Data processed by the Service Provider for the London Cycle Hire Scheme. This is primarily focussed on Data that refers to individuals but also includes types of Data that do not comprise of Personal Data.
- 1.1.2 It is important to note that retention periods set out in this document reflect current requirements which may be subject to change.
- 1.1.3 In the event of a dispute, Data must be maintained for as long as necessary to support the dispute process. A dispute may include, but not be limited to:
- a Customer Complaint;
 - a legal claim;
 - a complaint to the Ombudsman; or
 - any other court or legal proceedings.
- 1.1.4 All retention periods for scanned Documentation are provided under the assumption that the hard copy Documents are scanned to BSI 10008 (Evidential weight and legal admissibility of electronic information) standards. Where scanned Documentation does not meet BSI 10008 standards, then the hard copy Documents shall be retained for the same period as the corresponding scanned Documentation.

2 Electronic Records

2.1 Customer Records

Data Item	Retention Period	Description	Corresponding Standard (if applicable)
Customer Record – Registered Customer	12 Months of inactivity of the Customer	A Customer Record shall be deleted following twelve (12) Months of inactivity on the Scheme by that Customer.	TTL business requirement

	Record.		
Customer Record – Anonymous Customer	Varies	Anonymous Customers created when an anonymous Scheme interaction occurs e.g. Enquiry or Complaint. This Data should be deleted in line with the Data retention period of the associated transaction.	TTL business requirement
General Customer scanned correspondence	12 Months	Scanned images produced from scanning an item of general correspondence (Enquiry or Complaint) shall be deleted twelve (12) Months from the date of resolution.	TTL business requirement
Electronic or Scanned copies of Registration forms & supporting Documentation	Varies	Customer Registration forms shall be deleted immediately once a Customer is no longer Registered to the Scheme. This shall include but not be limited to when a Customer chooses to no longer be Registered with the Scheme or the Customer does not renew their Registration.	TTL business requirement
Scanned Images	13 Months	Unless otherwise specified, scanned document images should be retained for thirteen (13) Months from the scan date.	TTL business requirement

2.2 Finance

Data Item	Retention Period	Description	
Current individual financial transactions	18 Months from transaction date.	This Data will be retained online within the System. A Monthly process shall archive this Data following the eighteen (18) Month period.	PCI DSS Requirement 3
Archived individual financial	6 + 1 years	This Data shall be retained off-line on tape	PCI DSS Requirement 3

transactions		to ensure that financial Data is retained for a total of six plus one (6+1) years.	
Chargebacks	6 + 1 years	This summary Data shall be retained for six plus one (6+1) years for audit purposes.	PCI DSS Requirement 3
Credit/debit card details	18 Months	Credit and debit card details of Customer shall be retained for 18 Months. The Service Provider shall only retain either the last four digits of any card number.	PCI DSS Requirement 3
Direct debit and bank account details	18 months from transaction or end of direct debit agreement; whichever is the latest	Direct debit and bank account details of Customer shall be retained for 18 Months from transaction or end of direct debit agreement; whichever is the latest.	PCI DSS Requirement 3

2.3 On-Street Operations

Data Item	Retention Period	Description	
Customer journey Data	12 Months	A journey is created when a Bicycle is Hired and then subsequently Docked. Any Data related to a journey shall be deleted twelve (12) Months from the creation of the Data.	TTL business requirement
Bicycle Data	Life of the Bicycle	Any Data related to a Bicycle shall be deleted once the Bicycle no longer becomes operational within the Scheme.	TTL business requirement
Docking Point Data	12 Months	Any Data related to a Docking Point shall be	TTL business requirement

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		deleted twelve (12) Months from the creation of the Data.	
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2.4 Reporting

Data Item	Retention Period	Description	
Reporting Data	6 + 1 years	<p>Data used in Performance Indicator Reports, Operational Reports and Ad-Hoc Reports shall be retained for six plus one (6+1) years.</p> <p>After this period the Data shall only be retained if the equivalent Data is still retained in the Central Systems.</p> <p>The Data shall be purged no less than once a month or as otherwise agreed with TfL.</p>	TTL business requirement

2.5 System Operation

Data Item	Retention Period	Description	
Contact Centre call recordings	400 days	Contact Centre call recordings.	TTL business requirement
Audit of User password resets	12 Months	Audit of User password resets shall be retained for twelve (12) Months from creation.	TTL business requirement
User Audit log Data	12 Months	Sign-on and sign-off transactions shall be retained for twelve (12) Months from	TTL business requirement

		creation.	
Security Log Data.	12 Months	Retained for twelve (12) Months from creation.	TTL business requirement
Subject Access Request Data	6 Months	Following completion of a SAR.	TTL business requirement
Interface Log Data	24 Months	Following each event.	TTL business requirement

3 Physical Records

This includes multimedia records ranging from hardcopy documents to System backup tapes.

3.1 Customer Records

Data Item	Retention Period	Description	
Registration forms and supporting Documentation – Hard copy	30 days	Documents shall be retained for a period of thirty (30) days following the scan date.	TTL business requirement
General correspondence – hard copy	30 days	General correspondence including Enquires and Complaints shall be retained for a thirty (30) days period once the document has been scanned.	TTL business requirement

3.2 Finance

Data Item	Retention Period	Description	
Payment related correspondence – hard copies	30 days	From scan date.	PCI DSS Requirement 3

3.3 System Operation

Data Item	Retention Period	Description	
Backup Tapes	8 weeks	Overwritten at end of eight (8) week cycle.	TTL business requirement

3.4 Miscellaneous

Data Item	Retention Period	Description	
Data from other agencies	7 days	This shall be retained for seven (7) days after being loaded/ applied to the system.	TTL business requirement