



TCIS DATA RETENTION POLICY (Non-Academic)

This policy should be read together with the Thai- Chinese International School privacy policy

PURPOSE

The purpose of this Policy is to ensure that Thai- Chinese International School (TCIS) documents and records are properly maintained and not held for any longer than needed to meet the principle of data limitation.

TCIS recognizes that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of TCIS. This document provides the policy framework through which this effective management can be achieved and audited.

BENEFITS

The benefits of effective document and records management include:

- Protecting TCIS business critical records;
- ensuring that, whenever necessary, information can be retrieved quickly and efficiently;
- demonstrating compliance with legal and regulatory requirements; and
- reducing the risk of investigations and litigation.

SCOPE OF THE POLICY

This Policy applies to all documents and records, whether held in electronic form or otherwise. This Policy also applies to records which third parties manage on behalf of TCIS.

RETENTION SCHEDULE

The Retention Schedule included within this Policy sets out the periods for which TCIS's key documents and records should be held. These take account of mandatory requirements as well as generally accepted best practice.

The list of document and record types in the Retention Schedule is not exhaustive. If a particular document or record is not shown, guidance on the retention period should be sought from the DPO (Data Protection Officer).

STAFF RESPONSIBILITIES

TICS expects all members of staff and any third parties which are contracted to provide services to TCIS to:

- apply the retention periods stated in the Retention Schedule to any documents and records for which they are responsible; and
- protect confidential/privileged documents and records and those which are vital to TCIS continued operations.

DESTRUCTION OF RECORDS

Care should be taken when selecting the method of disposal. Only documents and records which contain non-sensitive information may be placed into waste-paper bins. Any personal or confidential information should be cross-cut shredded.

Destruction of electronic records should render them non-recoverable. Steps should be taken to ensure that all backups and copies are included in the destruction process.

SUSPENSION OF DESTRUCTION

If TCIS becomes the subject of litigation, or an investigation by a governmental or regulatory body, no documents or records of any nature should be destroyed, even if the Document Retention Schedule states otherwise.

The DPO will be responsible for communicating the implementation of an instruction which suspends the destruction of documents or records in these circumstances.

BREACH REPORTING

Any breaches of this Policy, or practices which are considered not to be compatible with it, should be brought to the attention of the DPO and IT Director.

RETENTION SCHEDULE(Non-Academic)

Type of document/record	Category	Retention period Mandatory	TCIS Retention Period	Citation
Company and Financial				
TCIS registration documents	Company Records	Until the dissolution of the company		Section 1116 of the Civil and Commercial Code B.E. 2468 (1992), and as amended ("CCC")
Board of directors meeting minutes and resolutions	Company Records	Until the dissolution of the company	Until the dissolution of the company	Section 1207 of the CCC
Annual Reports	Company Records	Ten Years		Section 1198 of the CCC
Accounting:				

Accounting records (private company) Balance Sheet, Profit & Loss account, cash flow statement - (explaining the company's transactions, financial position of the company)	Accounting Records	5 years From the annual closing date(statutory) 12 months of accounting period(statutory) 150 days from the last day of an accounting period 10 years from when the tax return is due		Section 14 of the Accounting Act B.E. 2543 (2000) ('the Accounting Act') Sections 18, 23, 65, 68bis, and 69 of the Revenue Code B.E. 2481 (2004) ('the Revenue Code') and Section 193/31 of the CCC
Official record of inspection of companies' accounts (containing detailed support for decision regarding planning and performing the audit, evidence obtained, and conclusions reached)	Accounting Records Audits	10 years from when the tax return is due		Sections 18, 23, 65, 68bis, 69, and 3septies of the Revenue Code and Section 193/31 of the CCC (See also Announcement of the Director-General of Section 3 September of the Revenue (12 March 2001) ('the Announcement of the Director-General'))
General taxes Information relevant to the company's tax position including all books, records, and data carriers	General taxes Information relevant to the company's tax position including all books, records, and data carriers	10 years from when the tax return is due		Sections 18 and 23 of the Revenue Code and Section 193/31 of the CCC
VAT records Records of delivery of goods or services,	Tax Records	5 years (statutory) 10 years		Section 87/3 of the Revenue Code

exports and imports, VAT invoices, etc.				Sections 18 and 23 of the Revenue Code and Section 193/31 of the CCC
Corporate income tax	Tax Records	10 years from when the tax return is due		Sections 18, 23, and 66 of the Revenue Code and Section 193/31 of the CCC
Records relating to tax returns A company which may be required to deliver a company tax return for any period must keep and preserve such records	Tax Records	10 years from when the tax return is due		Sections 18 and 23 of the Revenue Code and Section 193/31 of the CCC
Human Resources				
Recruitment Unsuccessful Applicants Including Special Category Data, background checks	Unsuccessful applicants' information	1 year from the date of rejection of application		Section 448 of the Civil and Commercial Code B.E. 2468 (1992) ('CCC')
Recruitment Successful applicants' information	Hiring Documents	For the entire duration of the employment relationship 10 years Plus, an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 578 of the CCC Section 193/30 of the CCC Section 193/32 of the CCC
Successful Applicants Information	Special category data or other data collected for diversity	10 years Plus an additional 10 years if		Section 193/30 of the CCC

	monitoring if permitted in your jurisdiction	legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/32 of the CCC
Successful Applicants Information	Background check data which may include / criminal conviction check data			Section 119 of the Labour Protection Act B.E. 2541 (1998) ('LPA') Section 193/30 of the CCC Section 193/32 of the CCC
Formal ID Records	Employment Records	2 years (statutory) 10 years From the termination of employment relationship From the commencement of legal proceedings		Sections 113 and 115 of the LPA Section 193/30 of the CCC Section 193/32 of the CCC
Social security number or other national identity numbers	Employment Records	No Statutory recommended for the duration of the employment relationship.		N/A
Bank details	Employment Records	2 years (statutory) 10 years Plus, an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the date of payment From the termination of employment relationship From the commencement of legal proceedings		Sections 113 and 115 of the LPA Sections 114 and 115 of the LPA Section 193/30 of the CCC Section 193/32 of the CCC

Information relating to the right to work	Employment Records	<p>2 years (statutory)</p> <p>10 years</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Sections 113 and 115 of the LPA</p> <p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Address and other personal contact details	Employment Records	<p>2 years (statutory)</p> <p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the date of payment</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Sections 113 and 115 of the LPA</p> <p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Work contact details (including work location)	Employment Records	<p>For the entire duration of the employment relationship</p> <p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the date of payment</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Next of kin and emergency contact details	Employment Records	<p>For the entire duration of the employment relationship</p> <p>10 years</p> <p>From the date of payment</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		N/A

Records of Promotion	Performance Records, Employment Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the date of payment From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Grievances	Performance Records, Employment Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Disciplinary Records	Performance Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Performance management	Performance Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Bonus awards	Performance Records	10 years Plus an additional 10 years if legal proceedings have been initiated		Section 193/30 of the CCC Section 193/32 of the CCC

		From the termination of employment relationship		
		From the commencement of legal proceedings		
Logs: Incident reports	Employment Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Logs: Attendance records	Employment Records	2 years (statutory) 10 years Plus an additional 10 years if legal proceedings have been initiated From the date of payment From the termination of employment relationship From the commencement of legal proceedings		Sections 114 and 115 of the LPA Section 193/30 of the CCC Section 193/32 of the CCC
Logs: Records of Annual leave	Employment Records	2 years (statutory) 10 years Plus an additional 10 years if legal proceedings have been initiated From the date of payment From the termination of employment relationship From the commencement of legal proceedings		Sections 114 and 115 of the LPA Section 193/30 of the CCC Section 193/32 of the CCC
Logs: Location Access Records	Employment Records	For the entire duration of the employment relationship 10 years Plus an additional 10 years if legal proceedings have been initiated		

		From the termination of employment relationship From the commencement of legal proceedings		
Medical Records: Doctors' notes including fit notes or similar	Medical Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the termination of employment relationship From the commencement of legal proceedings		Clause 7 of Ministerial Regulations on The Criteria and Procedure for Medical Examination of Employees and Submission of Examination Results to Labour Official B.E.2547 (2004) ('the Medical Examination Ministerial Regulations') Section 193/30 of the CCC
Medical Reports	Medical Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the termination of employment relationship From the commencement of legal proceedings		Clause 7 of the Medical Examination Ministerial Regulations Section 193/30 of the CCC Section 193/32 of the CCC
Records of adjustments or accommodations at work	Medical Records	For the entire duration of the employment relationship 10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship		Section 193/30 of the CCC Section 193/32 of the CCC

		From the commencement of legal proceedings		
Payslips	Payroll and tax records	2 years (statutory) 2 years 10 years From the date of payment From when the incident occurred From when the tax return is due		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the Revenue Code B.E. 2481 (2004) ('the Revenue Code') and Section 193/31 of the CCC
Records of gross and net salary	Payroll and tax records	2 years (statutory) 2 years 10 years From the date of payment From when the incident occurred From when the tax return is due		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the Revenue Code and Section 193/31 of the CCC
Records of deductions from salary	Payroll and Tax records	2 years (statutory) 2 years 10 years From the date of payment From when the incident occurred From when the tax return is due		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the Revenue Code and Section 193/31 of the CCC
Records of statutory (or tax) allowances	Payroll and tax records	2 years (statutory) 10 years From the date of payment From when the incident occurred		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the

		From when the tax return is due		Revenue Code and Section 193/31 of the CCC
Tax and national insurance or social security contributions	Payroll and tax records	2 years (statutory) 2 years 10 years From the date of payment From when the incident occurred From when the tax return is due		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the Revenue Code and Section 193/31 of the CCC
Payslips and payroll cards	Pension records	2 years (statutory) 10 years From the date of payment From when the incident occurred From when the tax return is due		Sections 114 and 115 of the LPA Section 193/34 of the CCC Sections 18, 23, 65, 68bis, and 69 of the Revenue Code and Section 193/31 of the CCC
Post termination elections: Elections to transfer or move pension funds, etc.	Pension Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Dependants and beneficiaries' data: Full name, addresses, bank details, etc.	Pension Records	10 years Plus an additional 10 years if legal proceedings have been initiated From the termination of employment relationship From the commencement of legal proceedings		Section 193/30 of the CCC Section 193/32 of the CCC
Records of elections	Pension Records	10 years		Section 193/30 of the CCC

		<p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		Section 193/32 of the CCC
Records of changes to contribution levels	Pension Records	<p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Records of employer matching or other contributions	Pension Records	<p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Health and Safety				
Standard/routine employee health documentation	Health and Safety records	<p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated occupational health questionnaires completed by employee, personal and occupational health histories.</p> <p>From the termination of employment relationship</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Section 115 of the Labour Protection Act B.E. 2541 (1998) ('LPA')</p> <p>Section 193/30 of the Civil and Commercial Code B.E. 2468 (1992) ('CCC')</p> <p>Section 193/32 of the CCC</p>
Drug/alcohol tests: Tests of employees for drugs/alcohol	Health and Safety records	<p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been</p>		<p>Section 115 of the LPA</p> <p>Section 193/30 of the CCC</p>

		<p>initiated from the termination of employment relationship</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		Section 193/32 of the CCC
Records relating to work arrangements based on employees' health. Individual reintegration plans, individual treatment agreements, degree of incapacity for work, required workplace adaptations, etc.	Health and Safety records	<p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated</p> <p>From the termination of employment relationship</p> <p>From the termination of employment relationship</p> <p>From the commencement of legal proceedings</p>		<p>Section 115 of the LPA</p> <p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Health and safety policies: Policies, systems, procedures, standards, guidance	Health and Safety Records	Until the dissolution of the company		N/A
Audit reports. Assessment of a business's system and processes, in which it is measured against regulated criteria to make sure health and safety standards are being upheld	Health and Safety Records	Until the dissolution of the company		N/A
Incident notifications. Notification of health and safety incidents arising from/during the conduct of business (e.g., death, serious injury or illness of a person /dangerous incident)	Health and Safety Records	<p>Until the dissolution of the company</p> <p>10 years</p> <p>Plus an additional 10 years if legal proceedings have been initiated from when the incident occurred</p> <p>From the commencement of legal proceedings</p>		<p>Section 193/30 of the CCC</p> <p>Section 193/32 of the CCC</p>
Investigation reports: Investigation reports	Health and Safety Records	Until the dissolution of the company		N/A

containing information on accidents/incidents occurred				
Risk assessments carried out in compliance with the law. Legally required assessment of the risks to the health and safety of employees to which they are exposed whilst they are at work/the risks to the health and safety of persons not in the employer's employment arising out of or in connection with the conduct by him of his undertaking.	Health and Safety Records	Until the dissolution of the company		N/A
Records and minutes of consultations with safety representatives and committees. These could include reports, problems, statistics, recommendations made, who made the recommendations and actions taken, the introduction of any measure which may substantially affect their health and safety at work, the planning of health and safety training, etc.	Health and Safety Records	Until the dissolution of the company		N/A
Information Technology				
Computer traffic data	IT Securities	90 days (statutory) 2 years		Section 12 (1) and (2) of the Notification of Ministry of Digital Economy and Society Re:

		from the date that data entered to the computer system.		Criteria on Storing Computer Traffic Data of Service Providers B.E. 2564 (2021)
Records of online meeting of the board of directors or shareholders	IT Securities	90 days (statutory)	Until the dissolution of the company	Emergency Decree on Electronic Meetings, B.E.2563 (2020) Clause 7 of the Notification of Ministry of Digital Economy and Society RE: Standards for Maintaining Security of Meetings via Electronic Means B.E. 2563 (2020)