Data retention policy

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1. Background

The data protection legislation states that personal data should not be held longer than necessary. In order to comply with this, Claims Portal Limited (CPL) will routinely archive and destroy any information that is no longer required.

This policy details the high-level retention periods for each stage of the claim process through the Portal.

Once the retention policy has been established and a claim has been flagged for disposal, in accordance with the Data Protection legislation, the information and documents are disposed of securely and can no longer be accessed.

1.1. Claims outside the claims process

For the purpose of this policy, a claim is deemed outside the claims process if it has either been drafted but not sent to a compensator / insurer or it has started the Claims Portal workflow and has left as a result of a positive action by a user or as a result of a time out.

The following retention periods will apply to claims that are deemed outside of the claims process:

- Draft Claim Notification Forms (CNFs in a status of Claim Data Input Edit) will be deleted if they have not been actioned for 90 calendar days.

- Claim Notification Forms that have been rejected by a Compensator (CNFs in a status of Claim Rejected To CR) will be deleted if they have not been actioned for 60 calendar days.

- Claim Notification Forms that have been taken out of the process by selecting Fraud (CNFs in a status of Fraud Stated) will be deleted if they have not been actioned for 30 calendar days.

- Claims that are marked as settled are deleted after 30 calendar days. Please see the Claims Portal website for a list of phases covered by the term 'settled'.

- Any claims that have left the claims process by reason of a time out, a liability decision, use of the exit function or repudiation of a Stage 2 Settlement Pack are moved to archive after 30 calendar days, where they will be deleted within one day.

- Claims that have reached 'End of Stage 2 End' (Court Proceedings Pack) will also be moved to archive after 30 calendar days. However, they will be retained in the archive for 12 months, and visible to authorised users.

- Note that there Is an automatic process to move claims to the final End phase after 30 days if the user has not confirmed the final step manually. The retention period starts at that point.

1.2. Inactive users

Users that have not logged on to the Claims portal for a period of 90 days will be automatically disabled.

1.3. Organisations where the User Agreement has not been accepted

Users are unable to process claims until a registered administrator has ticked to confirm that the organisation has accepted the User Agreement.

1.4. Notifications

Notifications are the messages generated by the Portal along the lifecycle of a claim as a consequence of certain events. For example, when the Compensator clicks the "Accept" button after receiving a claim notification form, the system generates a notification to the Claimant Representative that says: "Claim 123 accepted by Compensator".

Good housekeeping of the Portal requires old notifications to be deleted on a daily basis and we encourage users to remove old notifications.

Due to the number of claims on the Portal and the volume of new Notifications, the Portal will automatically remove notifications after 15 calendar days.

1.5. Policy compliance

1.5.1. Compliance measurement

Claims Portal will verify compliance to this policy through various methods, including but not limited to system reports and both internal and external audits.

1.5.2. Exceptions

Any exception to the policy must be approved by Claims Portal Governance Committee in advance.

1.5.3. Non-compliance

User organisations found to have violated this policy may be subject to suspension and or termination as detailed in the Claims Portal User Agreement.