



D-Day Leadership Academy — GDPR Data Retention & Deletion Policy

Program: The Normandy Passage • **Owner:** Privacy Lead (reports to DLA Director)

Effective: 18DEC2025 • **Version:** 1.0

Motto: Reverence. Fortitude. Virtue.

1) Purpose & Scope

Keep only what we need. No more, no longer. This policy governs **all** personal data processed for The Normandy Passage, including youth data, adult pairs, cadre/contractors, vendors, and media subjects.

2) Roles & Accountability

- **Controller:** D-Day Leadership Academy (DLA).
- **DLA Director:** Approves policy; authorizes legal holds.
- **Privacy Lead (Owner):** Maintains schedule; runs quarterly deletions; logs evidence.
- **Program Lead:** Ensures operational datasets follow this policy.
- **Finance Lead:** Ensures 7-year finance retention, then deletion.
- **Media Officer:** Executes consent/withdrawal takedowns.
- **IT Admin:** Implements technical deletion and access controls.

3) Clocks & Triggers

- **CE = Cohort End** (Day 7 closeout).
- **RT = Report Time** (link-up).
- **Retention clock** starts at **CE** unless noted.
- **Legal hold** suspends deletion until cleared.

4) Retention Schedule (authoritative)

Dataset / Record	System / Location	Lawful Basis	Retention	Clock Starts	Owner	Deletion Method
Enrollment & operational records (rosters, pair/match notes, watch rosters, attendance, late-arrival intake)	Google Drive (secure cohort folder)	Contract / Legit. interests	3 years	CE	Program Lead	Secure delete; purge Trash
Participant Terms, Code of Conduct, Assumption of Risk & Medical Waiver , Alcohol Acknowledgment (18+)	Drive (signed PDFs)	Contract / Legal obligation	7 years	CE	Program Lead	Secure delete; purge
Medical disclosures (conditions, meds), Incident reports (all severities) & care notes	Secure “Incident/Medical” folder	Vital interests / Legal obligation	7 years (longer if insurer/law)	Incident date	Privacy Lead	Secure delete; audit log
Safeguarding files (concerns, actions, reports to authority)	Secure safeguarding folder	Legal obligation / Vital interests	7 years (or per authority)	Incident date	Privacy Lead	Secure delete; audit log
Background-check fit/no-fit decisions & panel notes	Screening portal + summary in Drive	Legit. interests	3 years after last service	Separation date	Privacy Lead	Delete summary; vendor portal retention per DPA
MVR (driver checks)	Vendor portal / Driver file	Legit. interests	1 year	Check date	Program Lead	Delete report link; do not store copies
Driver assignment logs & vehicle rosters	Drive	Legit. interests	1 year	CE	Program Lead	Secure delete

Dataset / Record	System / Location	Lawful Basis	Retention	Clock Starts	Owner	Deletion Method
Financial (invoices, receipts, refunds, reconciliation)	Accounting system / Drive	Legal obligation	7 years	Fiscal year end	Finance Lead	System purge per FIN SOP
Routine comms (email threads, planning chats not needed for records)	Email/Drive	Legit. interests	2 years	Last activity	Privacy Lead	Auto-archive + delete
Decisions/policies affecting rights (approvals, SOP changes)	Drive (Governance)	Legit. interests / Legal obligation	7 years	Decision date	Director	Secure delete
Media Consents/Preferences	Drive (Consents)	Consent / Legit. interests	Active while consent in force + 2 years after withdrawal/end-use	Consent date / withdrawal	Media Officer	Secure delete
Media assets (photos/video/audio) used for publicity	DLA media archive + channels	Consent / Legit. interests	Until withdrawal or end-use; 5-year review cycle	First use	Media Officer	Remove from owned channels ≤30 days after withdrawal; archive purge on review
Vendor/site permissions (museums, ABMC protocols), transport contracts, lodging	Drive (Ops)	Contract / Legit. interests	7 years after expiry	Expiry date	Program Lead	Secure delete

Minors: same retention, but **minimize** content and identifiers. Face-obscure honored on DLA-controlled channels if selected.

5) Deletion & Withdrawal SOP

Quarterly deletion cycle (Privacy Lead):

1. Export **Deletion Worklist** (items reaching end of retention).
2. Notify Owners (Program/Finance/Media/IT).
3. Execute deletions; **no emailing** sensitive files—use secure Drive actions.
4. Record **Deletion Certificate** (dataset, IDs/paths, method, date, operator).
5. Close cycle; file audit log.

Media withdrawal (any time):

- Log request (ticket #); verify identity.
- **Cease new uses immediately.**
- **Remove** from DLA-controlled channels within **30 days** (technical limits aside).
- **Purge archive** copies linked to planned reuse; retain a low-res proof copy **only if** needed to document compliance (separate, restricted, **2 years**).
- **Request** takedowns from partners/platforms where feasible; log outcomes.

Subject rights (DSAR):

- Route to Privacy Lead; respond **≤1 month** (extend **≤2 months** for complexity).
- Provide copies/minimized extracts; record completion.

6) Legal Holds & Exceptions

- Director may place a **legal hold** for claims, investigations, or regulator queries.
- Items under hold are marked **NO DELETE**; owners are notified; the Privacy Lead audits monthly.
- Resume clock when hold lifts.

7) Security & Technical Controls

- Role-based access; least privilege.
- Encryption at rest (Drive) and in transit.
- No local copies; no USB.
- Versioning where needed; disable public links; domain-restricted sharing.
- Vendor DPAs + SCCs for EU data; use portals (no downloading reports).

8) Training & Audits

- Annual staff/cadre privacy briefing (15 min).
- **Quarterly** deletion report to Director (counts, exceptions).
- **Annual** policy review; update schedule if laws/operations change.

9) Templates (attach)

- **Retention Schedule** (this table as a standalone sheet).

- **Deletion Certificate** (dataset, IDs/paths, operator, date, method, verifier).
 - **DSAR Log** (requester, scope, due date, completed, notes).
 - **Media Withdrawal Tracker** (asset IDs, channels removed, partner takedown requests, completion).
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