Client Relationship Information Retention Policy

Companies covered:

- Experiences Production EXP Oy, Finland, Business ID: 2954037-7
- Rare Assets Management (RAM) LTD, registered in England and Wales, company number: 13900816

Both companies operating through www.aftersales.marketing

Policy owner: Vladislav Dobrokhotov, authorised representative of both companies
Effective from: 1 July 2026
Next review date: 1 July 2027, and annually thereafter

1. Purpose

We maintain limited information about client relationships so that we can provide consistent, informed and considerate service.

This may include not only factual records of meetings and transactions, but also relevant relationship context: how a client prefers to work, important previous experiences, commitments made, concerns raised and circumstances that may affect how we should communicate with or serve the client.

We do not retain such information indefinitely. Personal data is kept only while it remains relevant, accurate and necessary for a legitimate business purpose.

2. Principles

When recording client relationship information, employees must:

- record only information that is relevant to serving or managing the client relationship;
- distinguish facts from personal interpretations;
- use neutral, respectful and professional language;
- avoid recording gossip, speculation or unnecessary personal detail;
- not record sensitive personal data unless there is a clear legal basis and genuine business necessity;
- assume that the person concerned may exercise their right to see the information;
- review and delete information when it is no longer needed.

3. Retention periods

Information category	Default retention period
Routine meeting notes, correspondence and agreed actions	While the matter or relationship remains active, followed by review
Current working preferences, such as preferred communication style or meeting format	Review every 12 months and delete when no longer relevant
Relationship history explaining how trust was established or how an important situation was handled	Review every 24 months and retain only while it remains materially useful
Notes concerning temporary pressures, sensitivities, disputes or internal organisational circumstances	Review after 12 months and delete earlier when the circumstances have passed
Information about former client contacts	Delete or anonymise within 24 months after the relationship or relevant contact ends, unless continued retention can be justified
Contracts, invoices, accounting records and records required for legal claims or statutory compliance	Retained under the company's separate legal and financial retention requirements

These are maximum default periods, not automatic permissions to retain information. Information must be deleted sooner when it is no longer necessary.

4. Active relationships

An active client relationship does not justify keeping every historical note.

At least once each year, the responsible account owner must review significant relationship information and ask:

1. Is this information still accurate?
2. Is it still relevant to serving the client?
3. Would retaining it reasonably benefit the relationship?
4. Could the same purpose be achieved with less personal detail?
5. Would we be comfortable explaining the record to the person concerned?

Information that fails this review must be corrected, shortened, anonymised or deleted.

5. Closed and inactive relationships

When a client relationship ends or becomes inactive:

- operational reminders and temporary personal context should normally be deleted;
- commercially or professionally important relationship history may be retained for up to 24 months;
- continued retention beyond that period must have a documented reason;
- information kept solely because it might be useful one day must be deleted.

Where the business value lies in the lesson rather than the person's identity, the information should be anonymised.

6. Sensitive and inappropriate information

Relationship records must not normally contain information concerning health, political opinions, religion, ethnicity, sexual life, trade-union membership or other special-category personal data.

Employees must not record:

- rumours or unverified allegations;
- insulting or judgemental characterisations;
- irrelevant family or private-life information;
- inferred psychological diagnoses;
- information gathered covertly or from inappropriate sources;
- personal information that would not reasonably be expected in a professional client record.

Any exceptional need to process sensitive information must be referred to the policy owner before it is recorded.

7. Storage and access

Client relationship information must be stored only in approved company systems.

Access must be limited to employees who genuinely need the information to manage or serve the relationship. Relationship notes must not be kept indefinitely in personal notebooks, private email folders or unapproved applications.

Where technically possible, records should include a creation date, responsible owner and next review date.

8. Deletion and anonymisation

When the retention period expires, the responsible owner must:

- delete the information securely;
- anonymise it where the underlying business lesson remains valuable; or
- document the specific reason for extending its retention.

An extension must include a new review date and must not be indefinite.

9. Individual rights

Client relationship information is personal data where it relates to an identifiable individual.

The company will handle requests for access, correction, objection, restriction or erasure in accordance with its privacy procedures and applicable data-protection law.

10. Responsibility

Every employee who creates or uses client relationship records is responsible for complying with this policy.

The policy owner will review this policy annually and periodically verify that outdated relationship information is being corrected, anonymised or deleted.