

Personal Data Retention Policy

Coca Cola HBC Ireland & Northern Ireland

Latest Update: 17 May 2018

Data Retention Policy

Below paragraphs depicts an overview of **Coca Cola HBC Ireland and Northern Ireland** data retention policy. CCHBC legal entity hereinafter referred to as "the company."

1. Overview

A retention policy is important to ensure that the company's guidelines on retention are consistently applied throughout the organization.

2. Scope

The scope of this policy covers all company data stored on company-owned, company-leased, and otherwise company-provided systems and media, regardless of location.

Note that the need to retain certain information can be mandated by local laws & industry regulations and complies with EU General Data Protection Regulation (GDPR).

3. Policy

3.1 Retention Principles

CCHBC retains personal data in an identifiable format only for the interval that is necessary as identified by the purposes of processing for which data are collected.

CCHBC must not keep personal data for longer than necessary to fulfill the identified lawful business purposes or as long as required by applicable law.

CCHBC establishes a personal data retention period in accordance with relevant laws and regulations as part of the record of processing activities.

CCHBC must justify the requirements to retain personal data for periods longer than the maximum retention period as per business and regulatory requirements if required.

Some data must be retained in order to protect the company's interests, preserve evidence, and generally conform to good business practices. Some reasons for data retention include:

- Litigation
- Accident investigation
- Security incident investigation
- Regulatory requirements
- Intellectual property preservation

3.2 Retention Requirements

This section sets guidelines for retaining the different types of company data for **Coca Cola HBC Ireland and Northern Ireland**.

Record Type	NI	ROI
Application documents of the successful candidate, such as job applications, CV, test results, references, interview records	6 years from Termination	7 years from Termination
Copies of academic and other training materials	5 years from Termination	7 years from Termination
Photos/Videos	Duration of consent	Duration of consent
Records containing data on the geographical localization of a track at a certain moment	2 years (3 for data related to an accident)	2 years (3 for data related to an accident)
List of participants to non-working activities	Delete once the activity is carried out	Delete once the activity is carried out
List of location entries (by non-employees)	Delete periodically – end of week	Delete periodically – end of week.
Lists of participants to events	Consent should specify the retention period.	Consent should specify the retention period.
Invoices; copies of invoices	6 years and can be extended in the event of litigation	7 years
Contracts	6 years from Termination	7 years from Termination
Emails, letters and tickets	6 years from the date of the document	7 years from the date of the document
Orders/SOW/Procurement documents	Until expiry date of applicable	Until expiry date of applicable

	warranty. For orders submitted to suppliers – 6 years from the conclusion of the contract.	warranty or if document constitutes records under commercial and tax law – 7 years from order date.
--	-----------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------