

# Personal Data Retention Policy

## Data Retention Policy

Below paragraphs depicts an overview of **Coca-Cola HBC Romania SRL** data retention policy. **Coca-Cola HBC Romania SRL** 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 Romania SRL

Record Type	Years/Month
Visitor of the Web Site	12 month
Application documents of the successful candidate, such as job applications, CV, test results, references, interview records	3 years
Copies of academic and other training materials	75 years
Photos/Videos	According data subject consent (25 years)
List of participants to non-working activities	3 month
List of location entries (by non-employees)	2 years
Invoices; copies of invoices	10 years
Contracts	10 years
Letters and tickets	10 years The relevant documents should be kept accordingly, pursuant to the general commercial and tax law retention obligation for records.
Orders/SOW/Procurement documents	5 years