

Personal Data Retention Policy

Cyprus

Latest Update: 11 October 2018

Data Retention Policy

Below paragraphs depict an overview of **Lanitis Bros Ltd** data retention policy, a legal entity member of the Group of companies "Coca-Cola HBC AG", 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

The company 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.

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

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

The company 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 Lanitis Bros Ltd in Cyprus.

Record Type	Years
Visitor of the Web Site	Up to 15 days unless legal requirements or other specific purposes imply a longer retention period
Application documents of the successful candidate, such as job applications, CV, test results, references, interview records	Up to 7 years from the termination of the employment relationship
Photos/Videos	The retention period depends on the purpose of the processing and the consent of the data subject and until consent is revoked.
List of participants, different from employees, who take part to non-working events and/or activities	Up to 1 month from the date of collection of the data
List of location entries (by non-employees)	Up to 6 months from the date of collection of the data
Contracts	Up to 6 years from the date of collection of the data/from the termination of the contractual relationship
E-mails, letters and tickets	Up to 6 years from the termination of the employment relationship
Orders/SOW/Procurement documents	Up to 7 years. The retention period begins upon expiry of the relevant financial year.