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## 1. Personal Data Retention Policy

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### 1.1 Overview

The need to retain data varies widely with the type of data. Some data should be immediately deleted after their use and some must be retained until reasonable potential use for future need no longer exists. Since this can be somewhat subjective, a retention policy is important to ensure that the company's guidelines on retention are consistently applied throughout the organization.

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### 1.2 Purpose

The paragraphs below depicts an overview of **Nigerian Bottling Company Limited (NBC)** data retention policy (hereinafter referred to as "the Company.")

**The document is an extract from the CCHBC Personal Data Retention policy which includes retention periods for all countries so to provide information on retention periods for Nigerian Bottling Company Limited.**

**Any updates to the CCHBC Personal Data Retention Policy, which covers retention periods for all countries must be reflected as well to this document.**

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### 1.3 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 will comply with the EU General Data Protection Regulation. Where this policy differs from applicable regulations, the policy specified in the regulations will apply.

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### 1.4 Document Ownership and revision

The owner of this document is the Group Data Protection Officer(DPO) and jointly managed by the local DPo and Legal team.

Any updates to the CCHBC Personal Data Retention Policy, which covers retention periods relevant for all countries shall be reflected as well in this document. Updates shall also include local legislation which may come into force subsequently.

Group Data Protection Officer (DPO) is responsible to ensure this document is updated once the CCHBC Personal Data Retention Policy is updated, at minimum twice per year.

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### 1.5 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

## 1.6 Retention Requirements

This section sets guidelines for retaining the different types of company data for **Nigerian Bottling Company Limited**.

Record Type	Years
Employment contract; copy of identification document	Six (6) years from the date of cessation of employment.
Internal memorandums, appraisals	Internal Memoranda should be retained for as long as the document they pertain to or support.  Where the Memoranda does not pertain to or support a document: Six (6) years from the date of cessation of employment.  Appraisals: Two (2) years from the date of cessation of employment.
Other contracts entered into with the employee	Six (6) years from the date of cessation of employment.
Payroll files	Ten (10) years from the date of cessation of employment.
Payroll records (e.g. wages, pay slips, overtime compensation)	Ten (10) years from the date of cessation of employment.
Bonuses; reimbursements; benefits in kind; ticket restaurants	Ten (10) years from the date of cessation of employment.
Family allowance	Ten (10) years from the date of cessation of employment.
National Identity Records and Other means of identification.	Six (6) years from the date of cessation of employment.
Application documents of the successful candidate, such as job applications, CV, test results, references, interview records	Three (3) years from date of hiring decision
Copies of academic and other training materials	Six (6) years from the date of cessation of employment.
List of employees to which the services are provided	Six (6) years from the date of cessation of employment.
Accident record	Permanent
Reports related to personnel's car accidents	Permanent
Registry on controls over equipment	Ten (10) years from the date of cessation of employment.
Registry of exposure to hazardous substances and relevant health records	Ten (10) years from the date of cessation of employment.

Registry of medical visits; registry of medical information such as allergies, disabilities and dietary requirements, as well as other medical (occupational health & safety company doctor) files	Ten (10) years from the date of cessation of employment.
Records containing data on the geographical localization of a track at a certain moment	Two (2) years
Records on the individuals having a corporate credit card; records containing details of the corporate credit card	Six (6) years from the date of cessation of employment.
Registry of presences; sick leave records	Six (6) years from the date of cessation of employment.
List of participants to non-working activities	Six (6) years from the date of cessation of employment.
Badges	Immediately upon cessation of employment
List of entries (by non-employees)	Two(2) years from date of last entry
Calendar of business travels	Six (6) years from the date of cessation of employment.
Grievance and disciplinary records	Six (6) years from the date of cessation of employment.
Lists of participants to events	Periodic events: Two(2) years after the end of the last event.  One-time event: Two (2) year after the end of the event.
Records on pending litigation, regulatory investigations or other legal disputes	Permanent
Invoices; copies of invoices	Seven (7) years from the date of issue
Contracts	Seven (7) years after expiration or termination of the contract
Emails, letters and tickets	E-mails and Letters should be retained for as long as the document they pertain to /support.  Where the Letter or Email does not pertain to or support a document: Six (6) years from the date of cessation of employment.
Orders/SOW/Procurement documents	Orders/SOW/Procurement documents should be for as long as the Contract i.e. seven (7) years from the expiration or termination of the Contract.
List of contacts who gave their consent to receive marketing materials (e.g. newsletter, invites to events)	6 years upon withdrawal of marketing materials or completion of event.
List of participants to business events	6 years upon completion of event.
Letters, notices relating to bankruptcy procedure	Permanent
Documents and data useful to prevent or detecting any laundering or terrorism financing activities, enabling the analyses to be performed by the competent authority.	Permanent
Records and information related to the purchase, sale and improvement of real property and equipment	Permanent
Information requests; reports; remediation plans; workpapers	Permanent

Photos/Videos

Permanent

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### 1.7 Retention of Encrypted Data

Should any information retained under this policy is stored in an encrypted format, considerations must be taken for secure storage of the encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

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### 1.8 Data Destruction

Data destruction is a critical component of a data retention policy. When the retention timeframe expires, the company must actively destroy the data covered by this policy so to maintain compliance with the retention principles.

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### 1.9 Applicability of Other Policies

This document is part of the company's cohesive set of security policies. Other policies may apply to the topics covered in this document and as such the applicable policies should be reviewed as needed.

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### 1.10 Enforcement

This policy will be enforced by the CCHBC Group Data Protection Office, the Data Privacy Committee and the Nigerian Bottling Company's legal teams

Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company may report such activities to the applicable authorities.