

Personal Data Retention Policy

Nigeria Bottling Company

Latest Update: 17 May 2018

Data Retention Policy

Below paragraphs depicts an overview of **Nigerian Bottling Company Limited's** 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 Nigerian Bottling Company Limited.

Record Type	Years
Visitor of the Web Site	Three (3) years
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	Three (3) years from date of hiring decision
Photos/Videos	Permanent
Records containing data on the geographical localization of a track at a certain moment	Two (2) years
List of participants to non-working activities	Six (6) years from the date of cessation of employment.
List of location entries (by non-employees)	Two(2) years
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
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 after the termination or expiration of the Contract.