
1. Personal Data Retention Policy

1.1 Overview

The need to retain data varies widely with the type of data. Some data can be immediately deleted, and some must be retained until reasonable potential 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.

1.2 Purpose

Below paragraphs depicts an overview of **CCHBC Austria** data retention policy. The CCHBC legal entities located in Austria are hereinafter referred to as "the company."

The document is used as an export from the CCHBC Personal Data Retention policy which includes retention periods for all countries so to provide information on retention periods only for CCHBC entities located in Austria.

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

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, industry regulations and will comply with EU General Data Protection Regulation GDPR and the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003. Where this policy differs from applicable regulations, the policy specified in the regulations will apply.

1.4 Document Ownership and revision

The owner of this document is the Group Data Protection Officer (DPO)

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

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

1.5 Reasons for Data Retention

CCHBC does not simply adopt a "save everything" approach. That is not practical or cost-effective and would place an excessive burden on company and IT Staff to manage the constantly-growing amount of data.

Some data, however, 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 CCHBC Austria.

Record type	Retention period	Years (default)	Start date
Application documents of not selected candidates, such as job applications, CV, test results, references, interview records	data to be deleted shortly after the candidate has been rejected; in case of applicant consent 2 years; if litigation reasonably to be expected (grounds for discrimination) up to 6 months after the dismissal of the claim filed	2	**
Accident record	for at least 5 years; records to be kept under commercial and tax law 7 years; in case of potential litigation 3 year from moment accident becomes known or 30 years from moment of accident	7	***
List of entries (by non-employees)	monthly deletion	1 month	***
Records on pending litigation, regulatory investigations or other legal disputes	7 years; deletion after legally binding termination of the legal dispute and settlement of all claims arising from this legal dispute	7	*
Invoices; copies of invoices	7 years; if litigation reasonably to be expected up to 30 years	7	***
Orders/Scope of work/Procurement documents	7 years from the date of the order/conclusion of the contract	7	**
List of contacts who gave their consent to receive marketing materials (e.g. newsletter, invites to events)	until the withdrawal of the data subject's consent.	0	*
List of participants to events - third parties	1 year after end of the event	1	*
Letters, notices relating to bankruptcy procedure	7 years; for duration of bankruptcy procedure	7	***
Documents and data useful to prevent or detecting any laundering or terrorism financing activities, enabling the analyses to be performed by the competent authority.	5 years after compilation/filing to authority	5	**
Records and information related to the purchase, sale and improvement of real property and equipment	7 years; tax proceedings reasonably to be expected up to 30 years; real property 22 years	22	***

Documents related to management of external contractors in Edelstal	3 years from issuing date	3	**
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- * after termination
- ** from the date when the data was collected
- *** the retention period begins on expiry of the year