



# Data retention statement

This data retention statement describes which data retention strategy Relined B.V. uses.

## Definition of term 'data retention'

Data retention means the storage of all types of data, with a particular focus on personal data. 'Retention' also includes the associated policies and procedures to store the data.

Besides the English term 'data retention', the Dutch term '*dataretentie*' is used.

Data retention policy is a part of data governance, covering all aspects of data management, including, for example, access and access rights to the data. In essence, it covers the following points:

- Which data
- Who manages the data
- What is the retention period

## Retention period

An important part of the data retention policy is the retention period. In this context:

- Personal data should be relevant and limited to what is necessary for the purposes for which it is processed. This means that the retention period should be kept to a strict minimum.
- Personal data may only be processed if the purpose of the processing cannot reasonably be achieved by other means. The controller must set deadlines for erasure of data and review this periodically.

Largely, the retention period of documents is fixed in laws and regulations. For documents not covered by these, the GDPR does not prescribe specific retention periods. Relined applies the principle that personal data should not be kept longer than necessary, appropriate to the situation.

### Employee records retention period

Document	Retention period	Notes
Documents: <ul style="list-style-type: none"> <li>▪ Cover letter</li> <li>▪ Curriculum vitae (CV)</li> <li>▪ References</li> <li>▪ Correspondence with applicant</li> <li>▪ Certificates</li> </ul>	1 year  4 weeks	After end of employment  If an applicant is not hired then the above documents will be deleted after 4 weeks.
Documents: <ul style="list-style-type: none"> <li>▪ Employment contract</li> <li>▪ Correspondence on appointments, promotion/demotion and resignation</li> <li>▪ Reports of performance interviews and appraisals</li> <li>▪ Reports in the context of the Gatekeeper Improvement Act</li> <li>▪ Correspondence with occupational physician and the UWV regarding sick leave, and reintegration</li> </ul>	2 years	After end of employment
Documents: <ul style="list-style-type: none"> <li>▪ Payroll tax statement</li> <li>▪ Copy of proof of identity</li> </ul>	5 years	After end of employment
Documents: <ul style="list-style-type: none"> <li>▪ Payroll administration</li> <li>▪ Personal details of former employee (master card)</li> <li>▪ Date of joining</li> <li>▪ Employment conditions</li> <li>▪ Working conditions regarding cohabitation/partnership</li> <li>▪ Commuting distance declaration</li> </ul>	7 years	After date of taking customer satisfaction survey

**Retention period for log files in and around the office**

Document	Retention period	Notes
Overview of computer use: <ul style="list-style-type: none"> <li>Computer systems</li> <li>Email</li> <li>Internet monitoring</li> </ul>	6 months	Management via external IT party
Legal proceedings	2 years	After completion of procedure
Operational customer information: <ul style="list-style-type: none"> <li>Tenders</li> <li>Sales &amp; projects</li> <li>Procedures &amp; work instructions</li> <li>Technical documentation</li> <li>Customer files / contact management</li> </ul>	7 years	After date of termination of employment.  If applicable, to be recorded in processor agreement, SLA and/or contract.
Customer satisfaction	3 years	After date of taking customer satisfaction survey
Supplier review	1 year	After drafting date
Audits: <ul style="list-style-type: none"> <li>Internal</li> <li>External</li> </ul>	3 years	After date of end of audit or certification period
Complaints	3 years	After date of settlement of complaint

**Records retention period**

Document	Minimum retention period	Notes
General administration with as a minimum: <ul style="list-style-type: none"> <li>General ledger</li> <li>Debtor and creditor management</li> <li>Purchase and sales invoices</li> <li>Stock administration</li> <li>Payroll</li> </ul>	7 years	From 1 January after drafting
Value-added tax related invoices	7 years	After drafting date or receipt
Financial statements and auditor's report	7 years	As of drafting date
Profit and loss account	7 years	As of drafting date

Dividend notes	5 years	After drafting date
Data carriers of dissolved legal entity, such as: <ul style="list-style-type: none"><li>▪ Books</li><li>▪ Documents</li></ul>	7 years	After date of dissolution
Grant administration	10 years	From date of administration