

**INTERNATIONAL SCHOOL OF LUXEMBOURG
DATA RETENTION POLICY**

As a general principle, personal data and files containing them are retained for as long as is necessary to achieve the purpose for which they were collected, subject to statutory periods of limitation. For some categories of personal data, the law provides for mandatory retention periods.

I. Personal data concerning children and, where necessary, parents

Contractual documents and correspondence relating to such documents (letters, emails, etc.) (*)	School reports and information for academic and professional insertion (**)	Disciplinary files (***)	Special categories of data (“sensitive” data such as health, diversity, religion)
Up to 30 years from the end of the accounting year in which it was sent, or from the end of the relationship to which it relates, whichever is later.	Archived after the student leaves the school and retained till the student turns 30.	Deleted once the student leaves the school or archived till he/she graduates high school, whichever is later.	For data concerning diversity and religion: deleted once the student leaves the school, or as soon as consent to process such data is withdrawn. For data concerning health: after the student leaves school or archived till he/she graduates high school, whichever is later, or as soon as consent to process such data is withdrawn.

(*) Including document through which parents provide consent on behalf of their children

(**) Names, contact details, school years, subjects studied, results, diploma.

(***) All disciplinary measures taken against the student.

II. Personal data concerning employees, service providers, volunteers and interns

Employees' files	Employment contracts	Payroll administration	Records of employee expenses and earnings including payslips	Registers for annual leave, overtime, hours worked on Sundays, at night or on public holidays	Complementary pension scheme
3 years after the end of the contract	10 years as from the end of the civil year in the course of which the contract ends.	10 years as from the end of the accounting year to which the documents relate	10 years from the end of the accounting year in which it was sent, or from the end of the relationship to which it relates, whichever is later	30 years as from the end of the accounting year to which the documents relate	As long as the employee benefits from such complementary pension scheme

III. Personal data concerning candidates

Professional, academic and life (resume, covering letters, etc.)	Personal data concerning criminal convictions or offenses, and criminal records
1 year after the last contact with the candidate, unless candidate provides consent to a longer retention period, within the limit of 3 years	Candidates hired: 1 month after the hiring Candidates not hired: deleted once the decision of non-hiring is taken

IV. Personal data concerning suppliers (*)

Contracts and correspondence (letters, emails etc)

If the supplier is a “commercial” supplier (*commerçant*): 10 years from the end of the accounting year in which it was sent, or from the end of the relationship to which it relates, whichever is later; or

If the supplier is an independent contractor or independent service provider: 30 years from the end of the accounting year in which it was sent, or from the end of the relationship to which it relates, whichever is later

(*) This includes personal data concerning individual suppliers. For legal persons, this includes personal data concerning supplier’s employees, the processing of which is necessary to achieve the intended purpose and perform the contract (names of representative in contractual documents, name and contact details of senders/recipients in correspondence, etc.).