



Data Retention and Disposal Policy

BISS

1. Purpose

This policy explains how BISS manages the retention and the disposal of Personal Data. The purpose of this policy is to provide a clear pattern through which BISS defines categories, modalities and retention periods of Personal Data stored in paper archives and in company (and its Processor's) computer systems.

2. Applicability

All Authorized Persons working for BISS must be familiar with and apply the provisions described herein as from the Effective Date.

3. Reference standards

- Art. 5 GDPR
- Art. 6 GDPR
- Art. 13 GDPR
- Art. 25(2) GDPR
- Art. 28 GDPR
- The Personal Data Act («Personopplysningsloven») section 12
- The Bookkeeping Act ("Bokføringsloven")
- The Bookkeeping Regulations ("Bokføringsforskriften")

4. Criteria for the retention of Personal Data

Below is a list of criteria, retention and disposal methods that shall be followed by BISS.

With the entry into force of the GDPR, BISS has defined the retention period of BISS Personal Data, or, if this is not possible, the criteria relied upon to determine that period.

Since the determination of a criterion from a theoretical standpoint is simpler, as well as methodologically more correct, in order to determine a specific retention period, the identified progressive retention macro-criteria and the retention periods already defined are reported below.

Criteria and storage periods shall be determined according to the purposes pursued and lawful basis of a given Processing activity, concerning Personal Data relating to employees, external collaborators, candidates, students, and suppliers of BISS.

Criteria and periods of retention are constantly updated both in the Records of Processing Activities and in the privacy notices.

4.1 Regulatory criterion

This is the first criterion that BISS applies to check whether there is any law or legislative provision that establishes a determined storage period, in reference to other laws and regulations (e.g., retention periods for accounts).

This storage criterion is based on legal obligations upon the Data Controller.

Where it is not possible to identify a retention period provided for by law on the basis of the reference legislation, or where BISS considers the application of a different storage criterion as more appropriate, a second phase begins, which allows the application of the methodological criteria described below.

4.2 Necessity criterion

Where the above criteria are not applicable, based on the storage limitation principle, BISS applies the criterion of necessity: the Personal Data is stored for the time strictly necessary to achieve the contractual purpose or fulfil the requests of the Data Subjects for which it was collected, and subsequently deleted.

In this case, the storage criterion is based on the necessity to perform a contract or in order to take steps at the request of the Data Subject.

4.3 Opportunity criterion

BISS applies this criterion in all cases where regulatory criteria are not available, and there are legitimate reasons for BISS to store the Personal Data for a certain period of time (e.g., retention of data for defence in legal proceedings).

In these cases, the storage criterion may be based on Consent or legitimate interest (if applicable according to the local law).

5. Identified criteria or periods of retention

The retention periods already identified by BISS based on the criteria mentioned above are reported below.

Type of data and/or documents	Data retention periods/criterion	Legal basis	Explanation to support the choice
Recruiting (i.e., CV, cover letter etc.)	1 year	- Execution of a request from the data subject - Legitimate interest (defence in legal proceedings)	The retention period of 12 months has been deemed appropriate in light of the usefulness to contact a candidate with information that is still up to date.
Payments (payslips, reimbursement of expenses, taxation and related personnel service records, annual accounts, annual reports, audit reports, specifications necessary to	10 years from termination of employment relationship (opportunity criterion)	- Legitimate interest (defence in legal proceedings)	

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prepare such accounts and reports including audit trails and similar)	+ regulatory criterion)	- Legal obligation in the field of labour law.	
Administrative management of employees (establishment of the contractual relationship, payroll, pension, training, absence management, health status, welfare, internal communications)	10 years from termination of employment relationship (opportunity criterion + regulatory criterion)	- Legitimate interest (defence in legal proceedings) - Legal obligation.	
Information regarding employees' sick leave and the sick leave period	3 years and 6 months (regulatory criterion)	Legal obligation	
Documentation regarding follow-up of sick leave	Such documentation will be retained during the entire employment relationship (opportunity criterion + regulatory criterion)	Legal obligation	
Occupational disease and accidents	e.g., 10 years from termination of employment (opportunity criterion + regulatory criterion)	- Legitimate interest (defence in legal proceedings) - Legal obligation.	
Investigation report triggered by a HSE	Such information are retained in BISS' life cycle (opportunity criterion + regulatory criterion)	Legal obligation	
Damages related to bodily injury	e.g., 20 years (regulatory criterion)	Legal obligation	
Labour law litigation	e.g., 5 years from termination of employment (opportunity criterion)	Legitimate interest (defence in legal proceedings)	The retention period has been deemed sufficient to cover any pecuniary damage that might have emerged during the contractual relationship with the employee. This is

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			without prejudice to the legitimate interest of BISS to support the employee towards the social security institutions.
Images collected through video surveillance systems for security and protection of corporate assets	Storage is scheduled for a maximum period of 48 hours	Legitimate interest	The period indicated has been deemed sufficient to guarantee the protection of the company's assets (collections on display on the floors and goods in the store).
School registers, and admissions logs for minor students	6 years starting from the moment the minor student reaches his/her 18 th birthday (opportunity criterion)	Legitimate interest	According with norwegian law
Emails on the admissions	1 year (opportunity criterion)	Legitimate interest	According with norwegian law
Record for applicants who do not gain entry to school	1 year (opportunity criterion)	Legitimate interest	According with norwegian law
Former Students' personal data (i.e., Student name, identification number, legal gender, and nationality, Attendance records, Date of enrolment and leaving date)	10 years after the pupil leaves school		
Student's health and safety records			

6. Methods of storage

BISS's data is stored in paper format at the BISS headquarters in locked cabinets. The data in electronic format are stored in e-mail boxes on Microsoft Office 365 cloud servers.

7. Data deletion

At the end of the retention periods, BISS deletes Personal Data through secure deletion processes. If necessary, the operations take place through an anonymization process.

The deletion of BISS's Personal Data stored within Processors' systems is governed by the respective Data Protection Agreements.

The deletion of hard copies of BISS's Personal Data takes place under the responsibility of the Managements of each Area

Title	Policy on Data Retention and Disposal			
Date	Version	Changes	Owner	Approved by
June 2024	1.0		BISS Schools/Preschool	BISS Managment

Appendix I – Management Lists

Department	Management(s)
HR	_____
IT	_____
Administration	_____
Finance	_____
[...]	_____