

**Kraft Heinz**

**General Records Retention Policy - Provisional**

Title	<b>General Data Retention Policy</b>	Policy Owner	General Counsel
Date of Issue	23 May 2018	Effective Date	25 May 2018
Supersedes		Dated	
		Dated	

**POLICY SNAPSHOT**

**GENERAL RULE**

Kraft Heinz companies have a duty to handle business records likely to contain Personal Data in accordance with Data Protection Laws.

This Policy set out Kraft Heinz’s approach to the retention of general business records. There is a separate policy covering records relating to Kraft Heinz employees and contractors.

**For further information, please read the full contents of this Policy.**

**Policy Contents**

- A. Purpose of this Policy ..... 2**
- B. Scope ..... 2**
- C. Background ..... 2**
- D. Country Retention Schedules ..... 3**
  - Belgium ..... 3**
  - France ..... 5**
  - Germany ..... 7**
  - Ireland ..... 9**
  - Italy ..... 11**
  - The Netherlands ..... 13**
  - Poland ..... 15**
  - Spain ..... 17**
  - Sweden ..... 19**
  - United Kingdom ..... 21**

## **A. Purpose of this Policy**

This General Records Retention policy (**'Policy'**) set outs guidance for Kraft Heinz's retention of business records containing Personal Data (other than those HR records covered by Kraft Heinz's HR Records Retention policy) in order comply with Kraft Heinz's obligations under applicable Data Protection Laws.

It also takes account of other legal obligations such as requirements in respect of financial records and other forms of corporate record keeping.

## **B. Scope**

This Policy applies to all Kraft Heinz business records that are subject to applicable Data Protection Laws.

Data Protection Laws include the General Data Protection Regulation and other applicable privacy and data protection laws.

## **C. Background**

This Policy sets out Kraft Heinz's normal approach to the retention of non-HR business records in various European jurisdictions.

The retention periods in this Policy are for guidance only and in the event that Kraft Heinz reasonably considers that there is a need for variation, whether in respect of some or all records and whether temporarily or permanently, that variation may be applied unless prohibited by applicable Data Protection Law or otherwise by law.

Any questions in relation to this Policy should be addressed to the Data Privacy Team.

## D. Country Retention Schedules

### Belgium

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact

CCTV	1 year	Date of Record Creation
Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## France

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## Germany

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	40 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Accounting records consisting of Personal Data	10 years	End of financial year to which record relates
Financial information consisting of Personal Data	10 years	End of financial year to which record relates
Management information consisting of Personal Data	10 years	Date of Record Creation
Investor Personal Data	10 years	Date of Record Creation
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Systems Access and Use records	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation



**Ireland**

<b>Data Type</b>	<b>Retention Period</b>	<b>Start of retention period</b>
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## Italy

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	40 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Accounting records consisting of Personal Data	10 years	End of financial year to which record relates
Financial information consisting of Personal Data	10 years	End of financial year to which record relates
Management information consisting of Personal Data	10 years	Date of Record Creation
Investor Personal Data	10 years	Date of Record Creation
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Systems Access and Use records	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	4 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## The Netherlands

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	40 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## Poland

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation



## Spain

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

**Sweden**

<b>Data Type</b>	<b>Retention Period</b>	<b>Start of retention period</b>
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation

## United Kingdom

Data Type	Retention Period	Start of retention period
Records of and relating to corporate officers	Indefinite	
Board minutes and resolutions	Indefinite	
Records of corporate actions consisting of Personal Data	Indefinite	
Health & Safety Information	50 years	Date of Record Creation
Legal records consisting of Personal Data	15 years	Conclusion of matter unless required for corporate archive in which case record may be retained indefinitely
Consumer complaints	8 years	End of year in which last contact made/complaint conclusion
Accounting records consisting of Personal Data	7 years	End of financial year to which record relates
Financial information consisting of Personal Data	7 years	End of financial year to which record relates
Management information consisting of Personal Data	7 years	Date of Record Creation
Systems Access and Use records	7 years	Date of Record Creation
Investor Personal Data	7 years	Date of Record Creation
Consumer preferences and lifestyle information	7 years	Date of Record Creation
Consumer contact preferences	7 years	Date of Record Creation
Marketing information and data	7 years	Date of Record Creation
Visitor Logs	7 years	Date of Record Creation
Business contact information	7 years	Date of last contact
Consumer enquiries	3 years	Date of Contact
CCTV	1 year	Date of Record Creation

Competition/Prize draw information	1 year	Conclusion of promotion
Telephone call audio recordings (where made)	60 days	Date of Recording
Other items not listed above	7 years or as otherwise specified	Date of Record Creation