



POLICY FOR DATA RETENTION

With reference to the duration of data retention (Article 5 GDPR), Ocme srl adopts this Policy:

- a. Data will be kept in a form which permits identification of data subjects and no longer than is necessary for the purposes for which they are processed.
- b. Data related to curricula received both on a voluntary basis or following targeted searches will be kept for no longer than eighteen months from the date of receipt.
- c. Pursuant to Article 2948 c.c. and Article 6 of the Decree of the Minister of Labour of 9 July 2008, issued in pursuance to Article 39 of Law No 133/2008, data relating to employees, including those concerning the keeping of the Single Employment Ledger, the wage entitlement, the right to termination packages and, in general, to the documents related to the employment relationship, will be kept for a period of five years and six months from the date of termination of employment.
- d. Pursuant to Article 2220 c.c., data relating to clients, suppliers and, in general, to accounting records, will be kept for no longer than ten years from the date of registration and anyway from the date in which the relevant right matured. Data related to credits and compensation rights will be kept for the same period.
- e. Data of purely fiscal relevance will be kept for no longer than seven years and six months from the approval of the Financial Statements to which they refer.
- f. In all other cases, data will be kept for a period not exceeding the time limits relating to the forfeiture or limitation of rights.
- g. If, during the periods indicated above, prescription is interrupted, the expected duration begins from the time of the interruption.
- h. Advance delating of data following a request made by the data subject shall be conditional on the waiving of rights, requests or claims attributable to the data concerned.
- i. Compliance with data retention periods set by the present Policy will be ensured by:
 - o *scanning/data discovery tool* able to track data in the different systems in which they are processed
 - o mapping of data deadlines and an *alert* system warning about the need for data deletion or the need to obtain the renewal of the consent.

The Holder of Personal Data Treatment
OCME S.R.L.