

EMPLOYEE PERSONAL DATA RETENTION POLICY

1. General Provisions

1.1. The purpose of the Employee Personal Data Retention Policy (hereinafter - the Policy) is to regulate the principles of collection, use and retention of the Company's employees' Personal Data, to establish the purposes and means of processing employees' Personal Data, and to determine who may access employees' Personal Data and for what purposes.

1.2. This Policy applies to and is valid for all companies belonging to the GBY group, including UAB GBY, UAB GBY GROUP, UAB TAURA GROUP and other companies that currently belong to or may in the future be included in the GBY group of companies (hereinafter - the Company).

1.3. This Policy has been prepared on the basis of the Company's Personal Data Protection Policy.

1.4. The terms and abbreviations used in this Policy have the meanings explained in the Company's Personal Data Protection Policy.

2. Principles of Processing Employees' Personal Data

2.1. When processing employees' Personal Data, the Company follows these principles:

2.1.1. the Company processes employees' Personal Data only for lawful purposes defined in this Policy;

2.1.2. employees' Personal Data is processed accurately, fairly and lawfully, in compliance with legal requirements;

2.1.3. the Company processes employees' Personal Data in such a way that the Personal Data is accurate and continuously updated in the event of changes;

2.1.4. the Company processes employees' Personal Data only to the extent necessary to achieve the purposes of processing employees' Personal Data;

2.1.5. employees' Personal Data is retained in a form that allows their identity to be established for no longer than is necessary for the purposes for which such data was collected and processed.

3. Sources of Employees' Personal Data

3.1. The Company processes employees' Personal Data:

3.1.1. received directly from the employee when the employee provides information during recruitment and during the term of the employment contract;

3.1.2. generated when the employee uses information systems, for example when the employee uses the Company's internet network, makes telephone calls or enters the field of video surveillance, and when the employee participates in Company events;

3.1.3. received from other sources, for example from state institutions, healthcare institutions, courts, bailiffs and other authorities.

4. Purposes of Processing Employees' Personal Data

4.1. The Company collects and processes employees' Personal Data for the purposes specified below:

Purpose of Personal Data processing	Legal basis for Personal Data processing	Description of Personal Data categories	Personal Data retention period	Data processors
Employee recruitment	Article 6(1)(a) GDPR - consent	Name, surname, telephone number, e-mail address, education, information on the candidate's employment history (former/current)	During the recruitment period	-

		employers), the candidate's position, nature of work, brief description of duties), other information provided by the candidate in their CV or cover letter (date of birth, residential address, etc.), publicly available data of the candidate.		
Employment of foreign nationals	Performance of a contract, Article 6(1)(b) GDPR	Name, surname, personal identification number, contact details, residential address, education, qualification, identity card/passport number, date of issue and issuing authority of the identity card/passport, driving licence number, bank account number, medical health certificate.	As required for the employment process and in accordance with applicable statutory retention periods	-
Employment	Performance of a contract, Article 6(1)(b) GDPR	Name, surname, personal identification number, contact details, residential address, education, qualification, identity card/passport number, date of issue and issuing authority, driving licence number, bank account number, medical health certificate.	50 years after termination of the employment contract	-
Granting mother's days/father's days and gifts to employees' children under 14	Performance of a contract, Article 6(1)(b) GDPR, and consent, Article 6(1)(a) GDPR (in relation to clients)	Number of children, name, surname, date of birth.	Until the child reaches the age of 14	-
Health checks	Legal obligation, Article 6(1)(c) GDPR	Name, surname, position held, health booklet containing medical codes and health data.	Data is retained until the end of employment relations; after termination of the employment contract, the documents are returned.	-
Organisation of work events	Consent, Article 6(1)(a) GDPR, and legitimate interest, Article 6(1)(f) GDPR	Employee's image (photographs), video recording with added soundtrack, without	One year after the event; data is not deleted from social media systems.	Event organising companies, where applicable.

		specific conversations.		
Internal administration	Performance of a contract and legitimate interest, Article 6(1)(b) and (f) GDPR	Name, surname, position; where related to children - number and age of children.	One year after the end of the event.	-
Disciplinary sanctions	Legitimate interest, Article 6(1)(f) GDPR	Official disciplinary sanction, the reason for imposing it, filed in the employee's file.	50 years after termination of the employment contract.	-
Departure, dismissal	Legal obligation or consent, Article 6(1)(a) and (c) GDPR	Name, surname, personal identification number, identity document number, declared residential address, e-mail address, education, Sodra identification code, telephone number, bank account number (for salary payment), vehicle registration number.	50 years after termination of the employment contract.	-
Organisation of business trips	Performance of a contract, Article 6(1)(b) GDPR, and legitimate interest, Article 6(1)(f) GDPR	Information required for issuing an order - duration, purpose and destination of the business trip, expenses and other required information, name, surname, position held, personal identification number.	Filed and retained for 50 years after termination of the contract.	-
Remuneration	Performance of a contract, Article 6(1)(b) GDPR	Name, surname, position, established remuneration, bonuses, incapacity for work, family status, number of children, holidays, business trips, bank account, personal identification number, address.	50 years after termination of the contract.	SODRA, VMI
Video surveillance in common areas (production premises, control rooms)	Legitimate interest, Article 6(1)(f) GDPR	Image generated by cameras in which the employee's image may appear.	1 month.	-

5. Necessity of Providing Employees' Personal Data

5.1. During recruitment by the Company and while performing their direct work functions in the Company, employees must provide current Personal Data so that the Company can fulfil its obligations as an employer, for example provide correct information to state institutions, carry out payroll accounting fairly and, on the basis of the Company's legitimate interest, ensure smooth Company operations, development and prevention of possible breaches. If employees deliberately conceal or provide incorrect Personal Data that may affect the Company's operations, the Company has the right to apply sanctions.

5.2. Employees have the right to object and not provide Personal Data where the Company processes Personal Data on the basis of the employees' consent.

6. Transfer of Employees' Personal Data

6.1. Employees' Personal Data in the Company may be accessed by employees' immediate managers, as well as employees responsible for human resources management, payroll accounting and information technology maintenance. Access to employees' Personal Data is granted only to those Company employees who need the Personal Data to perform their direct functions and achieve the purposes specified in this Policy.

6.2. If employees must cooperate with the Company's clients, suppliers or partners in the performance of their duties, such persons may see the employees' name, surname, position, contact details and other information related to the performance of their direct functions.

6.3. Employees' Personal Data may be made available to the Company's Data Processors to the extent necessary for the performance of the established purposes. Personal Data may be transferred to data centre service providers, companies developing, providing, maintaining and improving software, companies providing information technology infrastructure services, as well as communication service providers. Personal Data may also be provided to insurance companies and audit service providers.

6.4. In accordance with the procedure established by legal acts, all necessary information about the Company's employees is transferred to state institutions and law enforcement authorities.

7. Employees' Rights

7.1. Employees of the Company, exercising their rights as Data Subjects, may request to:

7.1.1. access their Personal Data processed by the Company;

7.1.2. rectify inaccurate Personal Data;

7.1.3. erase Personal Data (the right to be forgotten);

7.1.4. restrict the processing of Personal Data;

7.1.5. transfer Personal Data;

7.1.6. object to the processing of Personal Data.

7.2. To exercise their rights, Company employees may contact the Company's appointed DPO by e-mail: DPO@gby.it.

7.3. The Company encourages employees who have questions about the processing of their Personal Data to contact the Company's DPO.

8. Personal Data Security Measures

8.1. Access rights to employees' Personal Data are granted only to those employees who need such data to perform their functions.

8.2. The Company ensures that employees' Personal Data is protected against unauthorised access, alteration, disclosure or destruction through organisational and technical security measures.

8.3. Employees who process Personal Data must comply with the Company's internal data protection procedures and confidentiality obligations.

9. Final Provisions

9.1. The Company has the right to amend this Policy in whole or in part. Employees are informed of amendments to the Policy in the manner established by the Company.

9.2. This Policy is reviewed at least once a year and updated where necessary.