

P&G RETENTION SCHEDULES FOR UNITED STATES AND EUROPEAN UNION CONSUMER AND EMPLOYEE PERSONAL DATA

These retention schedules apply to P&G United States (US), European Union (EU) and United Kingdom (UK) consumer and employee data, only. They do not apply to P&G consumer and employee data from other countries. The general rule is that any personal data should not be kept for longer than it is needed to provide the service. The periods below outline the maximum time personal data should be kept by you in providing the services. If you can delete the personal data sooner, you should do so. If a Master Services Agreement or Statement of Work provides for a more specific retention period for US, EU or UK personal data for the services you are providing to P&G, that retention period takes precedence over this document.

Consumer Retention Schedule:

- 1 POSTAL MAILING Maximum 30 days upon receipt of data.
- 2 EMAIL CAMPAIGN SENDING Maximum 50 days upon receipt of data.
- 3 SMS CAMPAIGN SENDING Maximum 50 days upon receipt of data.
- 4 P&G'S CONSUMER DATA PLATFORM 1. Maximum 50 months after non-activity.
2. Data necessary to suppress communications to opted out consumers may be retained indefinitely.
- 5 RATING AND REVIEW 1. Email address within maximum 30 days upon receipt of data.
2. Device-ID and IP-address within maximum 2 years upon receipt of data.
- 7 CONTESTS Maximum 24 months upon receipt of data, unless local law requires it to be kept longer.
- 8 COUPON ISSUING Maximum 30 days upon receipt of data.
- 9 COUPON CLEARING 1. Data P&G shares with clearing house (i.e. identification number) maximum 12 months.
2. Data consumer provides on the coupon to the retailer (including physical archive of coupons) 6 months, unless local law requires it to be kept longer.
- 10 SAMPLING Maximum 30 days upon receipt of data.
- 11 CASH BACK/CONSUMER REIMBURSEMENT Maximum 24 months upon receipt of data, unless local law requires it to be kept longer.
- 12 LOYALTY REWARDS MEMBERSHIP 1. Linkable personal data for reward fulfillment/sending is maximum 30 days upon receipt of data.
- 13 DELIVERY OF REQUESTED ITEMS Maximum 30 days upon receipt of data.
- 14 WORD OF MOUTH Maximum 24 months after campaign ends, unless local law requires it to be kept longer.
- 15 LOCAL CONSUMER CONTACT HANDLING 1. Maximum 24 months upon receipt of data, unless local law requires it to be kept longer.
2. Maximum 6 years for anonymous case data.
- 18 THIRD PARTY CONSUMER REGISTRATION/OPT IN Maximum 50 months after non-activity. Data necessary to suppress communications to opted out consumers may be retained indefinitely.
- 19 P&G CONSUMER REGISTRATION/OPT IN Maximum 50 months after non-activity. Data necessary to suppress communications to opted out consumers may be retained indefinitely.
- 20 EXTERNAL CONSUMER DATA ENRICHMENT Maximum 30 days upon receipt of data.
- 21 CONSUMER RESEARCH Maximum 5 years after time of collection. Anonymized data may be retained indefinitely.
- 22 DIGITAL MEDIA ADVERTISING Maximum 12 months upon receipt of data.
- 25 CLINICAL RESEARCH Maximum 10 years upon receipt of data, unless local law requires us to retain it for longer, for only first name and last name, email address, postal address, phone number, facial images for something other than trial endpoint analysis, administrative and compensation/financial documentation. Completed Informed Consent documents, facial images for trial endpoint analysis, and subject ID decode, as well as other data, are subject to the general clinical research 25-year retention schedule.
- 28 eCOMMERCE Payment providers (processors) and fulfillment/delivery providers must delete the data within 30 days of receiving it, unless required longer by local law. Data hosting providers may retain the personal data as long as necessary to fulfill the order and follow up with communications about the order.
- 29 CUSTOM AUDIENCES The vendor (e.g., an intermediary who performs the match with Facebook for us) will retain the hashed information only as long as necessary to perform the service.
- 31 WARRANTY EXTENSION (ORAL B) Maximum 10 years upon receipt for product registration data.
- 32 DMP FOR OFFLINE MAILING Maximum 50 months after non-activity. Data necessary to suppress communications to opted out consumers may be retained indefinitely.

Employee Retention Schedule:

Affinity Groups	ACTIVE	Global
Application Performance Analysis	ACTIVE+3 years Retention begins after operation is no longer used.	Global
Badges (physical security access)	Up to 1 year	Global
Benefits and Insurances (Health/Life/ADD/Disability)	ACTIVE+6 years Retention begins after service is no longer used.	Global
Carfleet	ACTIVE Records must be deleted after service is no longer used.	Global
Charitable Contributions	Up to 3 years	Global
Collaboration Agreements with Academic/Research Institutions & Related Third Parties	ACTIVE+6 years Retention begins after service is no longer used.	Global
Company Shop Payment/ Dining Services (Vending kiosks & machines)	CNTRY*	Global
Corporate Credit Cards and Travel Expense Accounting	CNTRY*	Global
Corporate Events/Meeting Planning/ P&G Sponsored Events	Up to 3 years	Global
Employee – External/Internal/Strategic/Function Training Course	ACTIVE+6 years	Global
Employee – External/Internal/Strategic/Function Training Course	ACTIVE+3 years Retention begins after service is no longer used.	Global
Employee – R&D Clinical, concept & use tests	Up to 2 years	Global
Employee - Service Awards and Power of You Recognition Programs (trophies, plaques, certificates with names)	ACTIVE+3 years Retention begins after service is no longer used.	Global
Employee Assistance Programs (psychological counseling/ therapy)	ACTIVE+6 years Retention begins after service is no longer used.	Global
Employee- Communications (photography and videography)	Up to 3 years	Global
Employee Emergency Contact list	ACTIVE	Global
Employee Monitoring (CCTV and Line Operations Cameras)	Up to 60 days	Global
Employee Monitoring (CCTV and Line Operations Cameras)	Up to 30 days	EU
Employee Monitoring (Networks, devices, computer logs)	Up to 1 year	Global
Employee Relocation – Domestic/International	6 years	Global
Employee Salary Planning	5 years	Global
Employee Shares/Stock Options/ISOP/PST or (Retirement savings plan)	75 years	Global
Employee Surveys	Up to 5 years	Global
Employee Tax & Social Security Support	6 years	Global
Executive Travel and Security	Up to 3 years	Global
External Audits, Legal Matters & Legal Consultancy	Up to 3 years	Global
Flower Services	Up to 3 years	Global
G001-General -IT-GBS Simplified Scope	Up to 1 year	Global
Holiday Gift	Up to 3 years	Global
HR Analytics	Up to 5 years	Global
HR Case Management (Employee Care)	Up to 3 years	Global
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+7 years Retention begins after operation is no longer used.	Australia

HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+30 years Retention begins after operation is no longer used.	Mexico
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+6 years Retention begins after operation is no longer used.	Global
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+15 years Retention begins after operation is no longer used.	Canada
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+10 years Retention begins after operation is no longer used.	Poland (post 2019)
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+50 years Retention begins after operation is no longer used.	Poland
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+3 years Retention begins after operation is no longer used.	USA except Ohio
HR Personnel Files/HR Data Management/ Work Permits/Employment Contract/ Work Certificates/Exit Interviews Business Processes/ My Personal Information-Life & Career	ACTIVE+6 years Retention begins after operation is no longer used.	USA- Ohio
Investigations	6 years	Global
IT Mobility	ACTIVE+ Up to 3 years Retention begins after service is no longer used.	Global
IT Support, IT Asset Management, and IT Invoicing Business Processes	ACTIVE+ Up to 3 years Retention begins after service is no longer used.	Global
Medical Occupational Health and Safety Business Process	ACTIVE+30 years Retention begins after operation is no longer used.	Global
Medical Occupational Health and Safety Business Process	ACTIVE+40 years Retention begins after operation is no longer used.	EU
Medical Occupational Health and Safety Business Process	ACTIVE+50 years Retention begins after operation is no longer used.	France
Military Service	ACTIVE+3 years	Global
My Career/ Employee Performance Related Assets	5 years	Global
My Career/Related Assets (5 Rocks, Peak Data, TDS, Rating and Reviews)	5 years	Global
Non-P&G Employees Temporary Labor/Staffing & Independent Contractor/Agents	ACTIVE+ Up to 3 years Retention begins after service is no longer used.	Global
On-Site/Sponsored Day Care	ACTIVE+6 years Retention begins after service is no longer used.	Global
Ordinary Work Related Activities	Up to 3 years	Global
Organization charts	Up to 3 years	Global
Other Facilities Services – Archiving and Destruction		
Other Site Services (Fitness/Dry Cleaning/Salons/Networks/Uniforms)	Up to 3 years	Global
Payroll/Other Compensation & Social Security/Unemployment	50 years	Romania
Payroll/Other Compensation & Social Security/Unemployment	50 years	Poland
Payroll/Other Compensation & Social Security/Unemployment	CNTRY*	Global
Pensions	75 years	Global

Postal Services	Up to 3 years	Global
Public Transportation/Parking	ACTIVE Records must be deleted after service is no longer used.	Global
Recruiting	3 years	Global
Recruiting (internal job posting)	5 years	Portugal
Recruiting (internal job posting)	3 years	Global
Schooling	6 years	Global
Separation Packages	CNTRY*	Global
Time and Attendance	Up to 3 years	Global
Trade Union Membership	Up to 3 years	Global
Travel	Up to 3 years	Global
Visitor Access	Up to 1 year	Global
Vouchers	ACTIVE+3 years	Global
Warehousing (inbound and outbound)	Up to 1 year	Global
Wellness programs	ACTIVE+6 years Retention begins after service is no longer used.	Global

Where CNTRY =

Retention Time Limit	Country
keep after July 1 2002	Argentina
keep after July 1 2007	Australia
keep after July 1 2001	Austria
keep after July 1 2007	Azerbaijan
keep after July 1 2007	Belgium
keep after July 1 1987	Brazil
keep after July 1 2005	Bulgaria
keep after July 1 2004	Canada
keep after July 1 1999	Chile
keep after July 1 2000	China
keep after July 1 2002	Colombia
keep after July 1 2005	Costa Rica
keep after July 1 2004	Croatia
keep after July 1 2005	Czech Republic
keep after July 1 2007	Denmark
keep after July 1 2007	Ecuador
keep after July 1 2001	Egypt
keep after July 1 2005	Finland
keep after July 1 2005	France
keep after July 1 2001	Germany
keep after July 1 2001	Greece
keep after July 1 2005	Guatemala
keep after July 1 2006	Hong Kong
keep after July 1 2007	Hungary
keep after July 1 1995	India
keep after July 1 2006	Indonesia
keep after July 1 2007	Ireland
keep after July 1 2007	Israel

keep after July 1 2005	Italy
keep after July 1 2007	Japan
keep after July 1 2007	Kazakhstan
keep after July 1 2006	Kenya
keep after July 1 2006	Lebanon
keep after July 1 2005	Luxembourg
keep after July 1 2003	Malaysia
keep after July 1 2005	Mexico
keep after July 1 2005	Morocco
keep after July 1 2007	Netherlands
keep after July 1 2007	New Zealand
keep after July 1 2005	Nigeria
keep after July 1 2005	Norway
keep after July 1 2005	Pakistan
keep after July 1 2000	Panama
keep after July 1 2005	Peru
keep after July 1 2002	Philippines
keep after July 1 2007	Poland
keep after July 1 2004	Portugal
keep after July 1 2005	Puerto Rico
keep after July 1 2005	Romania
keep after July 1 2007	Russia
keep after July 1 2005	Saudi Arabia
keep after July 1 2005	Singapore
keep after July 1 2005	Slovakia
keep after July 1 2007	South Africa
keep after July 1 2007	South Korea
keep after July 1 2007	Spain
keep after July 1 2007	Sweden
keep after July 1 2005	Switzerland
keep after July 1 2005	Taiwan
keep after July 1 2006	Thailand
keep after July 1 2005	Turkey
keep after July 1 2007	UK
keep after July 1 2007	Ukraine
keep after July 1 2007	United Arab Emirates
keep after July 1 2007	United States
keep after July 1 2005	Venezuela
keep after July 1 2004	Vietnam