

CWT Data Retention Policy 2023



RECORD TYPE: Client Products & Services

RECORD PURPOSE	RECORD DATA	RETENTION PERIOD
Relationship with corporate clients	Contracts and client relationship management records	10 years from latest accounting or administrative year in which service was provided
	Client communications	7 years from latest accounting or administrative year in which service was provided
	Travel program client reports e.g. travel spend, safety and security reports	5 years from latest accounting or administrative year in which service was provided
Secure user access to CWT online tools	Access logs	12 months from user account de-implementation
	Change Logs	13 months from date of change
Relationship with travelers and meeting attendees	Traveler and attendee profiles	13 months from client contract termination or from client-approved profile deletion request
	Bookings and itineraries	13 months from client contract termination or from client-approved profile deletion request
	Sanctions screening reports	5 years from screening date
Quality assurance and staff training	Satisfaction surveys	12 months from last interaction
	Call recordings	90 days from recording in Europe and Latin America regions 12 months in Asia-Pacific region
Management of invoicing	Client, traveler and travel service fees invoices	10 years from client contract termination

This Policy details CWT's main personal data records and retention periods. © CWT 2023

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RECORD TYPE: Client Service Support

RECORD PURPOSE	RECORD DATA	RETENTION PERIOD
Customer support	Traveler and attendee online interactions (email, Instant Messaging)	5 years from the last interaction
Individual's rights requests	Data Subject Access Requests	5 years from the last interaction

RECORD TYPE: Business Support

RECORD PURPOSE	RECORD DATA	RETENTION PERIOD
Security tickets and incident management records	Security tickets and incident management records	5 years from incident
Marketing prospection	Email communications	3 years from the last interaction
	List of opted-out individuals	Until new opt in
Website performance, functionality, advertising and social media	Cookies and tracking technologies	12 months from the reading or deposit of the cookie
Secure office access and safety of premises	Access history	3 months from access
	CCTV images	3 months from capture (1 month in France)
Relationship with corporate vendors	Vendor contracts	10 years from vendor contract termination
Management of invoicing	Vendor invoices	10 years from vendor contract termination

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