Week 9 journal attachment

ArcelorMittal

16. Retention and disposal of Personal Data Personal Data may not be retained for longer than it is required. Once the purpose for Processing or the legal basis for Processing expires, it may not be necessary to retain such Personal Data unless otherwise legally required. Some Personal Data will be kept for longer periods than others. It is important that appropriate data retention policies are developed in accordance with local legal and regulatory requirements to guide with record retention and disposal.

Personal Data must be disposed of in a way that protects the rights and freedoms of Data Subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) and in line with any guidelines for secure disposal of storage media.

**4. Data retention**

ArcelorMittal shall retain job candidate Personal Data for as long as it is required or in accordance with the legal requirements in the countries in which the Data is processed. Subsidiaries may have data retention policies that define the data retaining periods for various data held. Information on the specific data retention policies in a given region can be found below.

In case a candidate is hired by an entity of the ArcelorMittal Group, they will be requested to remove their personal data from the central “ArcelorMittalCareers” database.

In case of one year of inactivity of the candidate, their profile on the e-Resourcing site “ArcelorMittalCareers” will be automatically deleted.

1. **HOW LONG DO WE RETAIN YOUR PERSONAL DATA?**

We retain your personal data for a duration not exceeding what is necessary in light of the purpose pursued by the relevant processing and applicable laws on the Platform.

In other words, this means that the retention periods we apply vary depending on the reason for which we process the relevant data. The table below indicates, for each purpose, the retention period that will be applied to your personal data.

Please note that the retention periods indicated in the table are indicative and may be subject to change in accordance with legal requirements or operational needs. Once the retention period expires, we will delete or anonymize your personal data in accordance with applicable laws.

1. <https://corporate-media.arcelormittal.com/media/1c2dsssr/data-protection-policy_en.pdf>
2. <https://corporate.arcelormittal.com/careers/candidate-privacy-notice>
3. <https://distribution.arcelormittal.com/privacy>

Munich Re

**2.9 How long will your data be stored?**

We will delete your personal data as soon as it is no longer required for the purposes set out above, and no legal documentation or retention requirements apply, for example in the German Commercial Code (HGB), fiscal laws or the General Tax Code (AO). Furthermore, we only retain personal data in individual cases if this is necessary in connection with the defense, assertion or exercise of legal claims. Further details can be found, where applicable, in the description of the respective data processing operations.

**.10 How long will your data be stored?**

We will delete your personal data as soon as it is no longer required for the purposes set out above, and no legal documentation or retention requirements apply, for example in the German Commercial Code (HGB), fiscal laws or the General Tax Code (AO). Further details can be found, where applicable, under the respective types of data processing.

**Childrens’ Privacy**

Our Sites and Services are not directed to, and we do not intend to or knowingly collect Personal Information from children under 13. If we learn that we have collected any Personal Information from a child under the age of 13 without verifiable parental consent, we will delete that information from our files as quickly as possible. If you believe that we may have collected information from a child under 13, please contact us at the email address provided below.

**Retention of Personal Information**

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Statement or otherwise disclosed to you at the time of collection. We will retain certain Personal Information for as long as it is necessary pursuant to our records retention guidelines. Our records retention guidelines are based on our legal or business needs including but not limited to the following criteria: legal and regulatory obligations and requirements; contractual requirements owed to third parties; operational, fiscal, administrative or historical value to business operations; the duration of our business relationship with you, your employer or another related entity; the possibility of future complaints; whether the record is part of an insurance or reinsurance transaction or claim file; audits; investigations or litigation or the likelihood of these; the possibility of future insurance or reinsurance claim activity; whether the documentation is needed for processing of financial records; statutes of limitations; health and safety requirements; tax requirements; personnel requirements; corporate governance requirements; and record-keeping requirements.

### How long do we store your data?

We will delete your personal data as soon as it is no longer required for the aforementioned purposes. However, it is possible that your personal data may be saved until legal claims may no longer be asserted against our Company (a statutory limitation period of between 3 and 30 years). In addition, we will retain your personal data where we are required to do so by law. Relevant documentation and record-retention requirements are set out in applicable national laws (for example, in the German Commercial Code (HGB), the German Tax Code (AO), and the German Money Laundering Act (GwG). The applicable retention periods are up to ten years.)

1. <https://www.munichre.com/en/general/privacy.html>
2. <https://www.munichre.com/gla/en/general/privacy-statement.html>
3. <https://www.munichre.com/mrv/en/general/privacy-policy.html>
4. <https://www.munichre.com/en/general/privacy/data-protection_en.html>

China national offshore oil

## How long does OpenCorporates keep personal information

The information we collect forms part of our historical archive of company information. It is the express aim of the database to provide transparency of corporate connections, including historical connections, without which a full and accurate picture of the corporate world would remain hidden.

Maintaining this on an on-going basis is fundamental to our public interest mission, and is particularly important for those using our services for investigative purposes. Accordingly, we do not automatically delete or remove information from our public records register after a certain period of time (as the European Court of Justice [has ruled](https://curia.europa.eu/jcms/upload/docs/application/pdf/2017-03/cp170027en.pdf), “matters requiring the availability of personal data in the companies register may arise for many years after a company has ceased to exist”).

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

1. <https://opencorporates.com/public-records-privacy-policy/>
2. <https://opencorporates.com/user-privacy-policy/>

Sony

## Security; Retention and Monitoring

Unless otherwise required by law, we are not responsible for monitoring or recording any activity on the Website, although we reserve the right to do so.

To help protect you and others, we monitor use of the Website, and we use the information we collect, in order to: identify fraudulent activities; prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of the Website; ensure compliance with the applicable Terms & Conditions and this Privacy Policy; investigate violations of or enforce these agreements; and otherwise to protect the rights and property of us, our partners, and customers. Monitoring may result in the collection, recording, and analysis of online activities performed on the Website. If you do not consent to these conditions, you must discontinue your use of the Website.

We seek to maintain reasonable security measures designed to help protect the information we collect against unauthorized or accidental disclosure, access, misuse, loss, or alteration. There is no such thing as perfect security. Although we strive to protect the information we collect, we cannot ensure or warrant the security of such information.

We may retain information as long as it is necessary for us to fulfill the purposes outlined in this Privacy Policy. In addition, we may retain information for an additional period as is permitted or required to, among other things, comply with our legal obligations, resolve disputes, and enforce agreements. Where and when required by applicable law, we shall delete the information we collect. Even if we delete information from active databases, the information may remain on backup or storage media.

#### Security and Monitoring; Data Retention

Unless otherwise required by law, we are not responsible for monitoring or recording any activity on the Properties, including communications, although we reserve the right to do so.

To help protect you and others, we may monitor use of the Properties, and use personal information and other information we collect, in order to:  identify fraudulent activities and transactions; prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of the Properties; ensure compliance with the applicable terms of service and this Privacy Policy; investigate violations of or enforce these agreements; and otherwise to protect the rights and property of us, our partners, and customers.  Monitoring may result in the collection, recording, and analysis of online activity or communications through the Properties.  If you do not consent to these conditions, you must discontinue your use of the Properties.

We strive to maintain commercially reasonable security measures designed to help protect your information against unauthorized or accidental disclosure, access, misuse, loss, or alteration. However, there is no such thing as perfect security. Although we strive to protect your information, we cannot ensure or warrant the security of such information.

We retain all categories of Personal Information described in this Privacy Policy for as long as it is reasonably necessary for the purposes outlined in this Privacy Policy, considering the time period reasonably necessary to: provide the goods or services you request; exercise the choices and rights you have requested; comply with our contractual obligations comply with applicable legal, regulatory, or other obligations, including litigation holds and agency regulations. Except as noted differently on specific pages or in apps, we retain your Personal Information while you have an account with us, or while you are using our Properties or continuing to interact with us. When SEL no longer needs to use your information, we will (take steps to remove it from our active systems and records and/or to properly anonymize it so that you can no longer be identified from it. Even if we delete your information from active databases, the information may remain on backup or storage media to the extent allowed by applicable law.

#### Children’s Privacy

The sites we operate are general audience sites which do not target users under the age of 16. If SEL becomes aware that it has collected personal information from a child in contravention of any applicable laws and regulations, SEL will delete that personal information from its files promptly.

Any parent or guardian with questions regarding the collection or use of personal information relating to their child should contact us using the details provided in the Contact Us section below.

### 4. How long we retain your personal information

We retain Collected Data for as long as we continue to make the Website available to customers, and for a further 6 months following discontinuation, at which point the information will either be anonymized or destroyed. Please note that we may be required to retain certain information by law.

##### **DATA RETENTION**

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. This generally means holding the information for as long as one of the following apply:

* Your Personal Information is reasonably necessary to manage our operations, to manage your Business Relationship with us, or to satisfy another purpose for which we collected the information;
* Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
* Your Personal Information is reasonably necessary to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
* We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations.

Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please [contact us](https://intl.sonypictures.com/en/contact-us).

**Data Retention.** We retain all categories of Personal Information described in this California Privacy Notice for as long as it is reasonably necessary for the purposes outlined in this California Privacy Notice, considering the time period reasonably necessary to: provide the goods or services you request; exercise the choices and rights you have requested; comply with our contractual obligations; comply with applicable legal, regulatory, or other obligations; including litigation holds and agency regulations. Except as noted differently specific pages or apps, we retain your personal information while you have an account with us, or while you are using our Properties or continuing to interact with us.

## **How do we treat children's personal information?**

We do not knowingly collect or permit the collection, storage or use of any personal information from anyone under 16. Sony is committed to complying with all applicable laws and regulations regarding the collection, storage and use of personalninformation concerning children, including the Children's Online Privacy Protection Act in the United States and applicable local legislation in other countries. If you are a parent or guardian and are concerned that your child has provided us with personal information without your consent, you should contact us as set out below.

*For Residents of the United States*

If you are a parent or guardian who knows or has discovered that your child under the age of 13 has submitted his or her personal information or other information without your consent, permission or authorization, upon request, we will promptly: (a) provide direct notice to you indicating what, if any, personal information of your child has been collected and how it has been used and/or disclosed; (b)remove your child's personal information or other information from our database, cease the use of such information and direct any other party with access to such information to do the same; and (c) by notice to you, confirm compliance with the foregoing.

## **10. Retention of personal information**

We will only retain your personal information for as long as is reasonably necessary for the various purposes set out in this policy or to otherwise comply with applicable laws and regulations concerning the mandatory retention of certain types of information.

### retention of Personal Information

We will only retain your personal information for as long as is reasonably necessary for the various purposes set out in this policy or to otherwise comply with any applicable laws and regulations concerning the mandatory retention of certain types of information.

### 11. Children’s privacy (children 14 years of age and under)

Sony does not knowingly solicit or collect Personal Data from or about children (aged 14 and under) without the consent of a parent or guardian, and Sony does not knowingly market its products or services to children. If Sony becomes aware that the person submitting Personal Data, through any part of Sony’s websites, is a child, Sony will use reasonable efforts to delete that Personal Data from its files as soon as possible. Sony will also use reasonable efforts to ensure that this Personal Data is not used for any purpose, nor disclosed to any 3P. As Sony does not seek to collect any Personal Data about children, and Sony deletes any data collected inadvertently as soon as it is discovered, Sony retains no data about children that could be reviewed or deleted. If a parent requests review or deletion of data about their child before Sony has discovered and deleted the data, then Sony will of course honour that request.

1. <https://www.sony.com/en/privacy/>?
2. <https://electronics.sony.com/privacy-policy>
3. <https://www.sony.net/privacy-policy/>
4. <https://sites.sonypictures.com/corp/privacypolicies/b2b/privacy_ENGLISH.html>
5. <https://www.sonycreativesoftware.com/privacypolicy>
6. <https://www.sonynetworkcom.com/legal/privacy>
7. <https://www.sonybiotechnology.com/us/privacy-policy/>
8. <https://pro.sony/pro/pages/privacy/Privacy_statement_en_EU.html> .

Boeing

**Retention of personal information**  
Boeing stores your personal information for as long as you use the Services, and no longer than is necessary for the purposes for which the information was collected, or for which it is legitimately further processed. Thereafter, Boeing retains personal information for a period of time set forth in its corporate retention schedules. In the case of organizational Services data, Boeing retains personal information according to the timeframes set forth in relevant customer agreements, or in lieu of an agreement, for as long as a legitimate business purpose exists.

**Children’s privacy**  
In general, Boeing does not knowingly collect, use or disclose personal information from children, as defined by local law. If you believe that we have collected personal information about a child, please [Contact Us](https://www.boeing.com/privacy-and-cookie-policy.page#contactus) so that we can delete the information. Additionally, please [Contact Us](https://www.boeing.com/privacy-and-cookie-policy.page#contactus) to request removal of content or information that was posted to our Services when the registered user was under the age of 18.

However, some Services may collect, use or disclose personal information from children (as defined by local law) where it is necessary to do so; for example, a child member of a group using International Trip Planning Services (ITPS). This information is necessary to fulfil travel arrangements, ensure safety, to meet legal and regulatory requirements, and to provide, or arrange for appropriate assistance or facilities where necessary. This information will be collected with the consent of a responsible adult or guardian where possible. The personal information will be appropriately designated for extra protections and review and removal at the earliest opportunity. This personal information from children will be flagged to avoid direct marketing.

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| How long will the personal data be retained by this activity? | The personal data will be retained in accordance with the company Records and Information Management (RIM) requirements for a period of six years after the event date for audit purposes and then it will be deleted. |

**Retention and Deletion of Your Personal Information**

We retain your Personal Information for as long as it is needed to fulfill its intended use and to comply with applicable laws, and to comply with other legal obligations. The required period of retention varies depending the type of information and the laws in your location. The specific retention period for business records is set forth in company retention schedules in accordance with Company Records and Information Management requirements. When no longer needed, we either anonymize or dispose of your Personal Information using Company approved standard methods, which have been developed to prevent loss, theft, misuse or unauthorized access after disposal.

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| How long will the personal data be retained by this activity? | Unless it is deleted by the registrant, the data will be retained for three years. |

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| How long will the personal data be retained by this activity? | The data will be retained at least during the period of employment and afterwards for a period required by labor statutes and other laws where the data subject resides. |

Retention and Deletion of Your Personal Information

Boeing retains your personal information only as long as is necessary for evaluation for employment, as well as to comply with applicable laws relating to the evaluation of those seeking employment. After this time, normally two years, your information is deleted, unless you consent to retaining the information for a longer period of time.

1. <https://www.boeing.com/privacy-and-cookie-policy.page#:~:text=Data%20will%20be%20retained%20only,a%20records%20about%20the%20relationship>.
2. <https://www.boeing.com/privacy/notice-7005.html>
3. <https://www.boeing.com/privacy/employment-related-privacy-notice.html>
4. <https://www.boeing.com/privacy/notice-7804.html>
5. <https://www.boeing.com/privacy/notice-7855.html>
6. <https://www.bia-boeing.com/privacy>

Freddie Mac

Data Storage and Retention

We retain personally identifiable information that we collect or receive for as long as we need to use it in connection with our business and may retain it thereafter as determined in accordance with our corporate records retention program and in compliance with applicable laws.

## **Data Storage and Retention**

Your personally identifiable information is stored by Freddie Mac on its servers or on servers of our third-party service providers. We retain personally identifiable information that we collect or receive for as long as we need to use it in connection with our business and may retain it thereafter as determined in accordance with our corporate records retention program and in compliance with applicable laws. We continue to treat all personally identifiable information that we retain in accordance with the requirements of applicable laws and regulations and this Policy. For additional information on retention of biometric data of employees, on-site contractors, and other individuals who work for or with Freddie Mac, please also refer to our [Biometric Information Privacy Policy.](https://www.freddiemac.com/terms/privacy_biometrics.html)

## **Personal Information of Minors**

We do not have actual knowledge about selling or sharing personal information of consumers under the age of 18. Additionally, none of our websites are directed to individuals under the age of 13. We do not knowingly collect any information from children under the age of 13. If we become aware that information is or has been submitted by or collected from a child under the age of 13, we will delete that information.

## **Retention Period**

We intend to retain your personal information for up to seven (7) years after we finish providing you services, complying with our legal obligations, resolving disputes, and enforcing our agreements.

* Storage and Third-Party Disclosure. Biometric information is stored on segregated, company-owned servers and equipment and is disclosed to or stored with trusted third-parties who provide security, authentication, or fraud-prevention services to Freddie Mac. We do not sell, lease, trade or otherwise profit from biometric information.
* Retention. Freddie Mac retains biometric information only until, and permanently destroys such biometric information when, the purpose for obtaining it has been satisfied. Typically, this occurs within 30 days of the date when an individual who works for or with Freddie Mac and requires access to our facilities last interacts with Freddie Mac (normally when they stop working for or with us). In all cases, permanent destruction occurs no later than one (1) year after that date.

1. <https://www.freddiemac.com/terms/privacy#:~:text=Data%20Storage%20and%20Retention&text=We%20retain%20personally%20identifiable%20information,in%20compliance%20with%20applicable%20laws>.
2. <https://www.freddiemac.com/terms/state_privacy_notices>
3. <https://www.freddiemac.com/terms/privacy_biometrics>

Telefonica

* **How long is it processed for? – Retention period**: the data we process for this purpose will be subject to the general retention criteria set out in the following section of this Policy.
* **How long is it processed for? – Retention period**: the data we process for this purpose will be subject to the general retention criteria set out in the following section of this Policy.

## **4. How long is the data retained?**

In general, we will keep your data for the period necessary to comply with each of the purposes described in each processing activity and to determine the possible liabilities that may arise from that purpose.

In any case, your data will be kept in accordance with the retention criteria or specific periods described in each processing activity and, where appropriate, until you withdraw your consent and/or object to the processing of your data. In this regard, we will make our best efforts to provide you with an automatic and simple mechanism so that you can withdraw the consent granted and/or object to the processing and, in any case, we are at your disposal at the e-mail address for exercising your rights as indicated in section 6 of this Privacy Policy.

CHILD PRIVACY We are committed to promoting the appropriate use of our products and services by children. We strive to provide an environment that favours responsible use of the internet and mobile phones. In addition, we provide expert guidance regarding the safety and privacy of children via our online channels. We understand that the protection of privacy in this area is an issue that transcends Telefónica. That is why we participate actively in industry initiatives which promote respect for personal information and child privacy, and which provide education aimed at raising awareness in children of the implications that their own actions can have.

Personal data made available by users will be stored by Telefônica Brasil S.A. for the necessary period and according to the purposes for which they were collected. This information will be stored for the duration of the relationship between Telefônica Brasil S.A. and users.

1. <https://www.telefonica.com/en/privacy-policy/>

AmerisourceBergen

**Retention Period**

We will retain your Personal Information for as long as needed or permitted for the purpose(s) for which it was obtained. The criteria to determine retention periods include: (i) length of time of ongoing relationship with you, (ii) legal obligation to which we are subject or industry standards; (iii) quantity, nature and sensitivity of Personal Information; (iv) potential risk of harm in the event of unauthorized use or disclosure; and (v) the purpose of the processing and whether or not these purposes can be achieved by other means.

**Protection of Children**

AmerisourceBergen will not knowingly collect, use or disclose personally identifiable information from a minor under the age of 13, without obtaining prior consent from a person with parental responsibility (parent or guardian). AmerisourceBergen abides by laws protecting the privacy of children. Should a child whom we know to be under 13 provide personally identifiable information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving information about him or her.

**Protection of Children**AmerisourceBergen will not knowingly collect, use or disclose Personal Data from a Child without obtaining prior consent from a person with parental responsibility (parent or guardian). AmerisourceBergen abides by laws protecting the privacy of Children. Should a user whom we know to be under 18 provide Personal Data to us, we will use that information only to respond directly to that Child to inform him or her that we must have parental consent before receiving information about him or her and then delete it.

1. <https://www.amerisourcebergen.com/global-california-supplement>
2. <https://abcordersso.amerisourcebergen.com/abcorder_logon/privacy-policy.html>

Rosneft

**Duration of storage**We process and store your personal data only for the period required to fulfill the purpose of storage or if this has been provided for in laws or regulations. After discontinuation or fulfillment of the purpose, your personal data will be deleted or blocked. In the case of blocking, deletion will take place as soon as legal, statutory or contractual retention periods do not conflict with this; there is no reason to assume that deletion would impair your interests worthy of protection and deletion would not cause a disproportionately high expense due to the special nature of the storage.

1. <https://www.rosneft.de/legal-notice/privacy-statement/?lang=en>

China Railway Construction

Privacy Protection

Users can anonymously access the website and obtain information. If a user wants to use the website, services will be provided for the user by the website only after the user signs up at the website. To sign up, the user shall agree to the following item: The user shall provide the true, correct, latest and complete data on the user according to the prompt messages of the service registry, update them frequently and ensure that the data are the true, correct, latest and complete data.

The corporate solemn commitments: The Company shall strictly keep secret the personal information stored by the user and it shall neither disclose nor provide any of the information to any unrelated third party. Meanwhile, the website shall adopt reasonable security means to protect the information stored by the user.

**. How your personal information is stored**

If you visit our Website from places outside mainland China, please note that your information will **be stored and processed in mainland China.**

Generally speaking, we only keep your personal information for the shortest time necessary to achieve a purpose. After the expiration date, we will delete or anonymize your personal information. If we stop offering products or services on the 12306 Website, we will promptly stop collecting your personal information, notify you individually or by the means of public announcement of the termination of such business, and delete or anonymize the personal information that we hold after the service or operation is terminated.

### Transferring Data Outside of the EU

Your personal data may be transferred outside of the EU to countries with different data protection laws. When you submit your personal data, you consent to this transfer, storing and processing. When transmitting data outside of the EU we take all necessary precautions to ensure that it is done so securely and that your right to privacy is upheld.

### Children

Anyone aged under 13 must seek parental permission in order to allow their data to be stored. If you know of someone under 13 with their data stored with us, you should contact us directly to notify us.

1. <https://www.crtg.cn/privacystatement>
2. <https://www.12306.cn/en/privacy.html>
3. <https://www.business-humanrights.org/en/about-us/data-usages-cookies/>