

RETENTION PERIODS FOR PERSONAL DATA

Effective as of June 1, 2026

The retention of personal data is limited in time. Retention periods vary depending on the type of data and the purpose of the processing. They are set out below.

At Cooper Consumer Health, each employee is responsible for the data they hold. Therefore, once the applicable retention period has expired, every employee must:

- either place the personal data in a restricted/archive folder where authorized;
- or delete or anonymize the personal data.

Where the purpose of the processing has been fulfilled but a legal, regulatory, social security, tax, litigation, or compliance obligation justifies it, personal data may be retained in a restricted archiving environment, with access limited to authorized persons only. In certain countries, notably Spain, this mechanism may correspond to a legal obligation of *"bloqueo de datos"*, requiring data to be retained in a blocked manner, without active operational use, solely for the purpose of complying with legal, regulatory, audit, control, or legal defense obligations.

Data placed in an archive folder are also subject to a retention period. Once the applicable period has expired, persons with access to such data must delete or anonymize the personal data.

This document is based on a Group approach, with maximum harmonization to limit operational and compliance complexity.

1. RECRUITMENT

Purposes	Maximum retention period	
	In active records	In archive
Candidate management, recruitment process, and responses to applicants	Duration of the recruitment process until the outcome of the application	Selected candidate: integration into the employee file (see associated retention periods below) Non-selected candidate: 5 years from the close of the recruitment process (for evidentiary purposes, including potential discrimination claims)
Creation and maintenance of a candidate database ("talent pool")	Up to 2 years from the last contact with the non-selected candidate, unless the candidate objects	0

2. PERSONNEL ADMINISTRATION

Purposes	Maximum retention period	
	In active records	In archive
Management of the employee file	Duration of the employment relationship	5 years from the employee's departure

Employee register / Administrative information	Duration of employment	5 years from the employee's departure
Working time tracking	Until issuance of the relevant payroll statement	5 years from issuance of the payroll statement
Organization chart / Directory (employee data)	Employment contract	6 months from the end of the employment relationship

3. COMPENSATION MANAGEMENT

Purposes	Maximum retention period	
	In active records	In archive
Payroll processing (information required for payroll calculation)	Time required for payroll calculation	7 years from the creation of the documents
Provision of payslips	1 month from delivery to the employee	7 years from delivery to the employee (NB: availability of electronic payslips guaranteed until the employee has reached retirement age plus 6 years)
Payment of salaries and other amounts (employee banking data)	2 months from the employee's departure	0 except in case of litigation
Social security reporting	Time required to complete the filing	7 years after issuance or receipt of the reporting documents
Bonuses, profit-sharing, and similar schemes	Duration of the employment contract	3 years from the end of the employment contract
Meal payments	Time required for meal payment or card top-up	3 years from payment

4. PEOPLE AND ASSET SECURITY

Purposes	Maximum retention period	
	In active records	In archive
Access control other than through biometric authentication	3 months after recording	0
Video surveillance for the protection of people and property	1 month from the recording of the footage	In the event of a disciplinary, judicial, or criminal proceeding : extraction and separate retention for the duration of the proceeding

5. COMPANY VEHICLE MANAGEMENT

Purposes	Maximum retention period	
	In active records	In archive
Traffic fines and driver identification	Maximum 45 days from receipt of the traffic fine notice	According to the applicable limitation periods or the time required to manage litigation

6. COLLECTIVE LABOR RELATIONS MANAGEMENT

Purposes	Maximum retention period	
	In active records	In archive
Organization of employee representative elections (lists of voters and candidates)	Time required for voting operations	Until expiry of appeal periods
Management of employee representative mandates	Duration of the mandate	6 months from the end of the mandate
Minutes of employee representative meetings	10 years from the date of the meeting	Up to an additional 10 years where justified by legal or litigation requirements

7. WORKPLACE ACCIDENT MANAGEMENT

Purposes	Maximum retention period	
	In active records	In archive
Workplace accident reporting	Time required to manage the case	5 years from the employer's reporting date, unless longer specific obligations apply (e.g., recognition of an occupational disease, ongoing litigation, serious or fatal accident)
Health and safety inspections / labor inspections	5 years	5 years

8. FINANCE / ACCOUNTING / PROCUREMENT

Purposes	Maximum retention period	
	In active records	In archive
Supplier invoicing management	Duration of the processing cycle + 1 year	10 years from the accounting closing date
Payment tracking and reminders	Until payment or closure of any dispute	5 years from the last transaction or the end of the dispute
Management of orders and purchase orders	Duration of order fulfillment	10 years from the last transaction

Supplier dispute management	Until resolution of the dispute	5 years after closure of the dispute, or longer if legal proceedings are ongoing
Supplier relationship management	Duration of the business relationship	5 years from the end of the relationship (or 10 years for accounting records)

9. SALES / MARKETING

Purposes	Maximum retention period	
	In active records	In archive
Management of HCP prospects / B2B clients	As long as the relationship remains active	3 years from the last contact
Management of B2B client relationships / institutional HCPs	Active business relationship	3 years from the last contact or the end of the relationship
Tracking of customer interactions, requests, and complaints	Until closure of the request or dispute	5 years after closure
Organization of professional events	Until the event and immediate follow-up	3 years after the event
Management of product information requests	Until full processing of the request	3 years after closure
Management of marketing consents and opt-outs	As long as the consent or opt-out must be applied	5 years from transfer to archive

10. REGULATORY AFFAIRS / QUALITY

Purposes	Maximum retention period	
	In active records	In archive
Management of registration files / variations	Duration of the project and procedure	10 years after expiry of the file validity or product withdrawal
Quality complaint management	Until closure of the complaint	10 years after closure
Management of CAPAs / deviations	Duration of the corrective process	10 years after closure
Management of internal / external audits	5 years from closure of the report	5 years from transfer to archive

11. VIGILANCE / PRODUCT SAFETY

Purposes	Maximum retention period	
	In active records	In archive
Processing of vigilance cases	Until validation and processing of the case	10 years after end of product life
Monitoring of adverse event reports	Duration of the report processing	10 years after closure of the case file
Management of medical requests related to product safety / risk analyses	Until processing of the request	10 years after closure of the case file

12. CLINICAL STUDIES

Purposes	Maximum retention period	
	In active records	In archive
Recruitment and pre-screening of participants	During active selection	Until closure of the study, then archiving according to the protocol
Conduct and monitoring of the clinical study	Duration of the study	25 years after the end of the study
Management of participant consents	During participation and monitoring	25 years after the end of the study
Management of study safety / vigilance data	During active follow-up	25 years after the end of the study

13. HR MANAGEMENT BY ALL EMPLOYEES

Purposes	Maximum retention period	
	In active records	In archive
Management of direct reports	During the active reporting relationship	3 years after the end of the functional relationship
Tracking of objectives, approvals, and managerial exchanges	During the relevant year	5 years after closure of the fiscal year
Candidate management, recruitment process, and responses to applicants	Duration of the recruitment process until the outcome of the application	Selected candidate: integration into the employee file (see associated retention periods below) Non-selected candidate: 5 years from the close of the recruitment process (for evidentiary purposes, including potential discrimination claims)

Creation and maintenance of a candidate database ("talent pool")	Up to 2 years from the last contact with the non-selected candidate, unless the candidate objects	0
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14. WEB / IT / DATA ACCESS

Purposes	Maximum retention period	
	In active records	In archive
Contacts in email mailboxes	Employment contract of the mailbox owner	3 years after mailbox deactivation if required for business continuity or evidentiary purposes
Website analytics and site improvement	Duration of the session or strictly necessary calculation period	Maximum 13 months for trackers, then deletion or anonymization
Management of cookie banners and consent choices	As long as the choice must be applied	5 years from transfer to archive
Content personalization or marketing targeting	During the session or consent period	3 years after the last marketing interaction
Logging of system access	12 months	Maximum 3 years depending on criticality
Detection of abusive use or cyber risks	During alert analysis	Maximum 5 years after closure of the investigation
Management of user access rights	As long as access is necessary	Maximum 3 years after revocation
Management of IT tickets related to personal data	Until resolution	Maximum 3 years after closure

15. LEGAL / COMPLIANCE / LITIGATION

Purposes	Maximum retention period	
	In active records	In archive
Pre-litigation and litigation management	Duration of the dispute	Until exhaustion of all appeal remedies and expiry of limitation periods
Management of commercial contracts	During the term of the contract	5 years after the end of the contract, 10 years if accounting supporting documentation
Management of complaints and formal notices	Until response or settlement	5 years after closure

Reports / alerts (whistleblowing)	Unsubstantiated or dismissed report: 3 months Report leading to an investigation or proceeding: duration of the investigation until the final decision is made	Unsubstantiated report: 0 Dismissed report: 2 years after closure of the case file Report leading to an investigation without sanction/proceeding: 2 years after closure of the case file Report resulting in disciplinary action, litigation, reporting to authorities, or judicial proceedings: until exhaustion of all appeal remedies and expiry of limitation periods
Management of data subjects' GDPR requests	Until full processing of the request	5 years after closure