



CWT Retention Policy

This Policy describes CWT's main personal data records and associated retention periods.

RECORD PURPOSE	RECORD TYPE	RETENTION PERIOD
Provision of Products and Services		
Relationship with corporate clients	Contracts and relationship management records	10 years from latest accounting or administrative year in which service was provided
	Client communications (excludes marketing)	7 years from latest accounting or administrative year in which service was provided
	Client travel program 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
Relationship with travelers and meeting attendees	Traveler and attendee profiles	13 months from client contract termination or from client-approved profile deletion request
	Itineraries and reservations	
	Traveler and attendee communications	

	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 12 months in Asia-Pacific
Management of invoicing	Client, traveler and service fees invoices	10 years from client contract termination
Customer Service		
Customer support	Online interactions for traveller and attendee service requests (email, Instant Messaging)	5 years from the last interaction
Individual's rights requests	Data Subject Access Requests	5 years from the last interaction
Security Incident Management		
Security tickets and incidents records		5 years from incident
Marketing Communications		
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
Vendor Management		
Relationship with corporate vendors	Vendor contracts	10 years from vendor contract termination
Management of invoicing	Vendor invoices	