

# Luminor group data retention policy

## I. General information

This data retention policy (Data Retention Policy) describes how long Luminor retains certain types of Personal Data and sets out example retention periods applicable to the Luminor Group on the general level. Specific retention periods of your Personal Data might be also described in contracts, in other service-related documents and on Luminor's website: [www.luminorgroup.com](http://www.luminorgroup.com)

This Data Retention Policy shall constitute integral part of the Luminor Group Privacy Policy, available at <https://www.luminor.ee/en/privacy-policy>. Capitalised terms used in this Data Retention Policy shall have the same meaning as those defined in the Luminor Group Privacy Policy.

## II. Data retention principles

Luminor retains Personal Data in accordance with the General Data Protection Regulation (or "GDPR") and applicable national laws. As a general principle, Personal Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed.

Personal Data retention periods are stipulated by applicable laws or determined by Luminor in accordance with the applicable laws and depend on the specific type of document or contract and the Personal Data Processing basis. Obligation to retain certain documents containing Personal Data for a specific time period arises on the basis of applicable law, for example, when such retention periods are stipulated in legislation preventing money laundering and terrorist financing, taxation legislation, accounting legislation or employment legislation.

Retention of certain Personal Data might also be permitted based on Luminor's legitimate interests, except where such interests are overridden by the interests or fundamental rights

and freedoms of the data subject which require protection of Personal Data. An example of Personal Data retention based on Luminor's legitimate interests is when we need to protect our rights in litigation. For that purpose, Luminor retains certain documents containing Personal Data until the expiry of the limitation period related to such documents. However, please note that upon relying on the legitimate interest of Luminor, Luminor will, in each individual case, analyse whether retaining Personal Data is necessary for the purpose of the legitimate interest pursued by Luminor and Luminor will opt to choose the shortest appropriate retention period.

The Schedule below provides an example summary of certain retention periods determined by Luminor. It is not an exhaustive list and shall not form a legally binding contract between Luminor and the data subject. Luminor is entitled to unilaterally change the retention periods at any time. Please also note that retention periods stipulated by applicable law might be subject to change from time to time.

### III. Schedule: example data retention periods

#### Know Your Client data (KYC)

Document type	Retention period
Personal Data disclosed by the data subject to Luminor in relation to Luminor's obligation to implement the "Know Your Customer" (KYC) principle, including client data provided by the client upon opening an account (Estonia, Latvia)	5 years after termination of the business relationship with the data subject
Personal Data disclosed by the data subject to Luminor in relation to Luminor's obligation to implement the "Know Your Customer" (KYC) principle, including client data provided by the client upon opening an account (Lithuania)	Customer Personal Data may be kept for the general term of the statute of limitations to ensure the protection of the data controller's lawful interests

#### Anti-money laundering and counter terrorist financing

Document type	Retention period
Copies of documents collected from the data subject for the purposes of identification of a natural person including, name, personal identification code or, if none, the date and place of birth and the place of residence or seat, if applicable, then information on the identification and verification of the right of representation and scope thereof (Estonia, Latvia)	5 years after termination of the business relationship with the data subject
Copies of documents collected from the data subject for the purposes of identification of legal person (Estonia, Latvia)	5 years after termination of the business relationship with the data subject
Registered data of transactions, including transaction date or period and a description of the substance of the transaction and data of other circumstances of the transaction (Estonia, Latvia)	No less than 5 years after termination of the business relationship with the data subject or no less than 5 years after performing the duty to report to the Financial Intelligence Unit, if applicable
Financial institutions and other obligated entities must keep a register of reports of suspicious monetary transactions (Lithuania)	The register data in paper form or in electronic form must be stored for 8 years from the end date of transactions or business relations with the customer

Document type	Retention period
Investigation records. Financial institutions and other obligated parties must pay attention to activities that they consider to be inherently related to money laundering and / or terrorist financing. Financial institutions and other obligated entities must examine the basis and purpose of such transactions and record the results of the investigation in writing (Lithuania)	Results of such investigations must be kept for 5 years in paper form or in electronic form. Storage periods may be extended additionally for a period not exceeding 2 years, by the order of the competent authority.
Transactions and conclusion of contracts (Lithuania)	Documents and data relating to the execution of monetary transactions or conclusion of contracts that confirm a monetary transaction or conclusion of a contract must be kept for 8 years

## Retaining data until the expiry of limitation periods of the claims

Document type	Retention period
Retaining any Personal Data collected in the course of a contractual or pre-contractual relationship between the data subject and Luminor until the expiry of the limitation period for a claim arising from the transaction (Estonia, Latvia, Lithuania)	10 years as of the claim falling due (i.e. as of the entitled person obtaining the right to claim performance of the obligation corresponding to the claim)
Retaining Personal Data obtained on the basis of data subject's consent (Estonia)	3 years as of the withdrawal
Retaining Personal Data obtained on the basis of data subject's consent (Latvia)	5 years as of the withdrawal
Retaining any Personal Data collected in the course of a contractual or pre-contractual relationship between the data subject and Luminor until the expiry of the limitation period for a claim arising from the transaction if the obligated person intentionally violated the person's obligation (Estonia)	10 years as of the claim falling due (i.e. as of the entitled person obtaining the right to claim performance of the obligation corresponding to the claim)
Retaining any Personal Data collected in the course of a contractual or pre-contractual relationship between the data subject and Luminor until the expiry of the limitation period for submission of claims against a member of a directing body of a legal person (Estonia)	5 years as of the claim falling due (i.e. as of the entitled person obtaining the right to claim performance of the obligation corresponding to the claim)



## Accounting documents

Document type	Retention period
Accounting ledgers, journals, contracts, financial statements, reports and other business documents which are necessary for reconstructing business transactions during audits (Estonia)	7 years as of the end of the corresponding financial year
Business documents relating to long-term liabilities or rights (Estonia)	7 years as of the end of the corresponding financial year
Other accounting source documents (Estonia)	7 years as of the end of the financial year
For any Personal Data included in the annual accounts (Latvia)	Till reorganization or liquidation of the company.
For any Personal Data included in inventory lists, accounting registers and documents pertaining to accounting organization (Latvia)	10 years as of the end of the corresponding financial year
Other accounting source documents (Latvia)	Not less than 5 years as of the end of the financial year
General obligation for retention of accounts, books of account and records (Lithuania)	Minimum 10 years. The 10-year retention period starts in the year following the expiry of the calendar year in which the accounting year (to which the information relates) was closed.

## Tax related documents

Document type	Retention period
Any tax-related documents, for example, documents related to transactions and payments and other documents relevant for taxation purposes (Estonia, Latvia)	At least 7 years as of 1 January of the year following the preparation or receipt of the document
General obligation of taxpayers to provide (upon request of the tax inspector) all information that may be relevant to their tax position, including all books, records and other data carriers (Lithuania)	The retention of documents for tax purposes follows the rules in the Law on Tax Administration and the Law on Value Added Tax under which VAT invoices must be preserved for 10 years after they were issued
Employment related documents	
Employment contract (Estonia, Latvia)	10 years as of the expiry of the employment contract
Employment contract (Lithuania)	50 years as of the expiry of the employment contract
Workplace risk assessment results documentation (Estonia)	55 years

Document type	Retention period
Workplace risk assessment results documentation (Latvia)	At least 3 years
Documentation on investigations of occupational accidents and occupational diseases (Estonia)	55 years
Documentation on investigations of occupational accidents and occupational diseases (Latvia)	45 years
Payroll and salary records (Estonia)	7 years
Payroll and salary records (Latvia)	Minimum 10 years
Retention of any Personal Data collected in the course of an employment relationship until the expiry of the limitation period of a claim arising from the employment relationship (Estonia)	1 year as of the termination of the employment relationship
Retention of any Personal Data collected in the course of the recruitment process until the expiry of the limitation period of a claim for compensation for damage (Estonia)	1 year as of serving the recruitment decision
Retention of any Personal Data collected in the course of the recruitment process (Latvia)	<p>Maximum: Candidate Personal Data for refused candidates are deleted within 3 months of the conclusion of the recruitment process. The retention period starts when the applicant is notified of the refusal to hire.</p> <p>General employment documentation (i.e. hired employees) is retained for the duration of employment and for 2 to 10 years thereafter.</p>
Reports on employee performance review meetings and assessment interviews (competency database) (Lithuania)	No specific maximum retention period, general rules apply. Reports must not be retained longer than necessary for their original purpose.
The employer must keep records of salaries and wages (Lithuania)	<p>Minimum 50 years.</p> <p>Requests from employees to apply for a non-taxable income amount, requests to provide support for withholding tax discount purposes must be retained in the company's records.</p>
Human Resource and employment documents likely to be subject to a maximum retention period based on data protection rules: Data of rejected job applicants (e.g. application letters, CVs, references, certificates of good conduct, job interview notes, assessment and psychological test results) (Lithuania)	Maximum: candidate Personal Data for refused candidates must be deleted as soon as the recruitment process has been concluded. The retention period starts when the application process ends (another candidate is chosen)
Copy of identification documents (Lithuania)	No specific maximum retention period, general rules apply



Document type	Retention period
Work (shifts) schedules (Lithuania)	Minimum 3 years
Employees' use of internet and e-mail (Lithuania)	Maximum: there is no specific retention period established in the legal acts. General data protection principles of minimization and necessity apply. Data must be deleted and not kept longer than necessary having regard to the purpose of log maintenance.

## Surveillance records

Document type	Retention period
CCTV camera recordings (Estonia, Latvia, Lithuania)	90 days as of when the recording was made unless a longer retention period is necessary for the purposes of investigating the specific incident
Login and log files (Estonia, Latvia, Lithuania)	At least 1 year.

## IV. What will happen with your Personal Data after the retention period?

After the retention period expires, all documents containing Personal Data will be permanently deleted, destroyed or made anonymous in a form which does not permit identification of data subjects. Documents not deleted, destroyed or made anonymous automatically will be deleted, destroyed or made anonymous by Luminor manually right after the retention period has expired, but in any case not later than 3 months after 1 January of the year following the expiry of the retention period. Luminor will not notify the data subject about the deletion, destruction or making anonymous of his/her Personal Data nor ask his/her permission to delete or destroy Personal Data after the retention period.

Please note that certain Personal Data retained on computer files may be available after the retention period for a certain time period in data backup systems until those files in the data backup system are overwritten. Usually, files in the data backup systems are not overwritten at once, leaving an appropriate margin for the possibility of restoring data at the needed time. A multi-level backup system must be used, including synchronous and asynchronous replication and tape restore in line with business needs, information security requirements and compliance. Luminor keeps all backup systems secure, and access to backup system files by Luminor personnel is limited to authorized personnel.



## V. Questions and contact details

If you, as a data subject, wish to have detailed information on the exact retention periods for your Personal Data processed by us, or if you have any questions about retention periods determined by Luminor, Luminor encourages you to contact us by e-mail.

### Contact details are following:

Data protection officer in Lithuania  
[dataprotectionLT@luminorgroup.com](mailto:dataprotectionLT@luminorgroup.com)

Data protection officer in Latvia  
[dataprotectionLV@luminorgroup.com](mailto:dataprotectionLV@luminorgroup.com)

Data protection officer in Estonia  
[dataprotectionEE@luminorgroup.com](mailto:dataprotectionEE@luminorgroup.com)

You may also contact Luminor using other contact channels as provided on Luminor's web-pages <https://www.luminor.ee/en/contacts>.

