

# Privacy, Data Protection & Retention

## CCS Data Retention Schedule

<b>Document Title</b>	CCS Data Retention Schedule	<b>Document Author</b>	Senior Analyst, PMO
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### Introduction to this Schedule Background

Carnival Corporate Shipbuilding is subject to specific legal and internal requirements to retain records, for example for ship information.

However, where records include personal data, also known as Personal Identifiable Information (PII), then that personal data may be retained in identifiable form for no longer than necessary for the purpose for which it is processed and should be anonymised or destroyed thereafter.

Carnival Corporate Shipbuilding (CCS) members are guided to follow the policies and principles within this document to define acceptable minimum and maximum thresholds for the retention of different types of ship or personal data, and to define whether the data should either be:

- retained – and, if so, for what period; or
- disposed of – and, if so, when, and by what method (for example, destruction, anonymisation).

The standard includes an exception mechanism where there is a valid requirement to retain personal data and has been clearly defined to align to the guidance provided.

### Purpose

This schedule defines general minimum and maximum data retention periods for use within Carnival Corporate Shipbuilding.

### Scope

This schedule applies to all records containing ship & personal data held by Carnival Corporate Shipbuilding, whether in electronic or paper form; stored in Carnival systems or premises, or third-party systems or premises with a formal agreement in place with Carnival Corporate Shipbuilding; held on shore/site or held in production or archive systems.

## Applicability

This schedule applies to all Carnival Corporate Shipbuilding employees, contractors, and temporary staff working within Carnival Corporate Shipbuilding, and all references to 'employee' in this standard include reference to roles mentioned. It shall cover systems such as email, defined shared folders (but not all), Docova document management system. Any data retained on an individual or group OneDrive, SharePoint or MS Teams folders will be subject to regular deletion.

\*At this time, CCS Site Department are developing a process of how data is stored on CCS Site Servers which will be applicable to external users. This will be captured in a later revision of the CCS Data Retention Schedule.

## Compliance with this schedule

It is the responsibility of each employee to ensure that the schedule is applied to ship and personal data under their control. A failure by any employee to comply with the associated schedules may constitute a disciplinary offence for which action up to and including dismissal may be taken.

## Related documents

Individual Carnival Corporate Shipbuilding departments are responsible for preparing and maintaining data retention standards in accordance with the Carnival Corporate Shipbuilding Data Retention Schedule (this document). Departments within Carnival Corporate Shipbuilding may elect to prepare their own schedules if appropriate. Schedules will be subject to approval by the Corporate Shipbuilding ELT & the documents governed by the PMO Team.

## Microsoft Outlook email Retention Process

Carnival Corporate Shipbuilding have agreed an Email Retention Policy where emails will be automatically reviewed through M365 Compliance Manager. M365 Compliance Manager is an Information Protection Module for sensitivity labelling and enforces information governance for retention policies. The data retention period set depends on the type of data included in the sent to or received by a CCS employee's email. Emails received and sent by CCS personnel with an email ending with @carnivalshipbuilding.com will be automatically reviewed by the tool and filtered into different retention period areas. Emails which include PII, as per the defined list from Microsoft within the table below (*Record Retention Periods – Corporate Shipbuilding*) will be kept for a shorter period. All emails which do not include PII information will be classed as Ship Information and will have the sensitivity label 'CCS Data' applied and be kept up to 40 years from the relevant ship's delivery which is also defined in the table within this document (*Record Retention Periods – Corporate Shipbuilding*). How the system reviews each email can be seen in Figure 1.2 & Figure 1.2.1.

When the retention period is due to expire the decision to process the deletion of the data will be followed where the appropriate role within CUK IT will notify the relevant role with CCS that the deletion date is due. The process can be seen within Figure 1.1.

## OneDrive, SharePoint and MS Teams Retention Process

OneDrive, SharePoint and MS Teams are not seen as core areas for CCS to retain data however it is recognized that these are tools used by CCS. Each tool will have the ability for the user to manually select whether data is to be kept as 'CCS Data' i.e Ship Information. It is important that CCS Personnel understand the definition of each retention period when the retention period tool is applied to data. It is recommended that data is kept in the core areas: Docova, Email and the Southampton Drives where the appropriate Record Retention Periods (see below) are applied automatically to each area.

## CCS Shared Folder Structure

The Carnival Corporate Shipbuilding Shared Folder Structure is currently within design and will follow the relevant data retention periods. The retention periods will follow those mentioned in the table but will aim to be clearly defined within the CCS Folder Structure Design Document. All will need to adhere to filing data appropriately in the correct location.

## Record Retention Periods – Corporate Shipbuilding

Data Subject	Data Type	Purpose of Processing	Minimum Retention Period	Maximum Retention Period	Applicable Legislation and Notes
Ship Information	Ship Information	Ship Information can be defined as any information that involves or refers to a specific ship owned or previously owned by Carnival Corporation.		Life of the Ship (Circa 25 years) + 15 years after decommissioning or being sold, or up to a maximum of 40 years from delivery of the ship in question. In a series of a ship design, the prototype ship information must be kept for the lifetime of the final ship of that class within Carnival Corp Ownership.	Email 'Sensitivity' Label will apply to all employee email & shared inboxes. Emails which include Ship Information will be kept for the period of time mentioned (up to 40 years).  Docova follows the same retention period for this data.
Personal Information (PII)	PII	Should the information include Personal Identifiable Information and adhere to General Data Protection Regulation (GDPR).		5 Years	Example can be found using the following link: <a href="https://docs.microsoft.com/en-us/microsoft-365/compliance/sensitive-information-type-entity-definitions?view=o365-worldwide">https://docs.microsoft.com/en-us/microsoft-365/compliance/sensitive-information-type-entity-definitions?view=o365-worldwide</a>  The list mentioned within the link above defines the PII retention policy. It is important to note that for our email retention policy addresses cannot be included in PII as in 'most' cases, emails have an address within the email signature and therefore some information may be discounted or stored/filtered to the wrong location.
Secure CCS HR Data	Information included within or under the banner of Reward shall be kept under a separately defined retention period.	The information included within this area includes in general: Pay Reviews, Reward letters, Performance documentation.		6 years	This information is required to be kept for 6 years post the employee leaving the Company. People Services are responsible for notifying and informing IT when a member of Corporate Shipbuilding leaves the Company to start the retention period.  The CCS folder structure retention period includes this within the defined policies but must be triggered by the People Services team (If this is the process CUK IT agree to follow).

<p><i>Individual data held on Company provided personal devices</i></p>	<p><i>PII, Ship Information, private data within Employee's OneDrive</i></p>	<p><i>Private data must not be kept on any Company devices, and if kept the Company assumes no liability to maintain, retain or check such data for appropriateness.</i></p>	<p><i>n/a</i></p>	<p><i>Life of the Ship (Circa 25 years) + 15 years after decommissioning or being sold, or up to a maximum of 40 years from delivery of the ship in question. In a series of a ship design, the prototype ship information must be kept for the lifetime of the final ship of that class</i></p>	
<p><i>Docova</i></p>	<p><i>Ship Information, PII</i></p>	<p><i>Docova is a tool used as a repository for Ship Information only. PII will not be stored within the tool.</i></p>	<p><i>n/a</i></p>	<p><i>Life of the Ship (Circa 25 years) + 15 years after decommissioning or being sold, or up to a maximum of 40 years from delivery of the ship in question. In a series of a ship design, the prototype ship information must be kept for the lifetime of the final ship of that class</i></p>	<p><i>Docova requires manual deletion by the Project Support team to delete data. Therefore once the retention period has been reached, a project support team member will be required delete the required information. This should be checked with the relevant parties at the time to get an OK to delete this information.</i></p>

Figure 1.0 – CCS Data Retention Expiry - Deletion Process

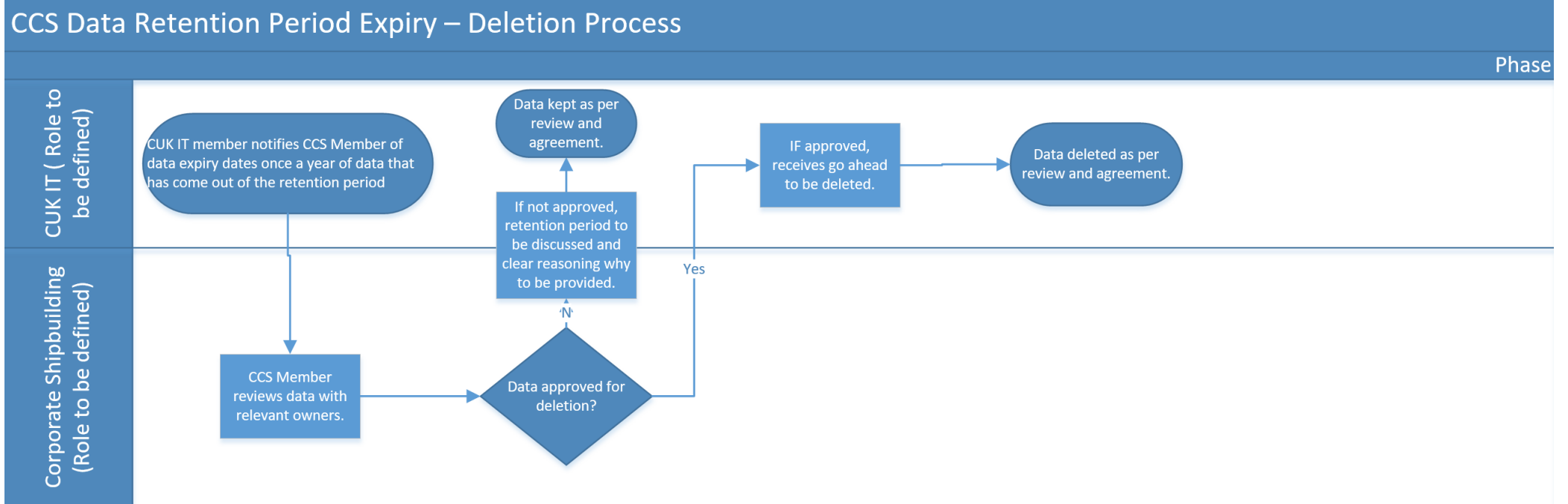
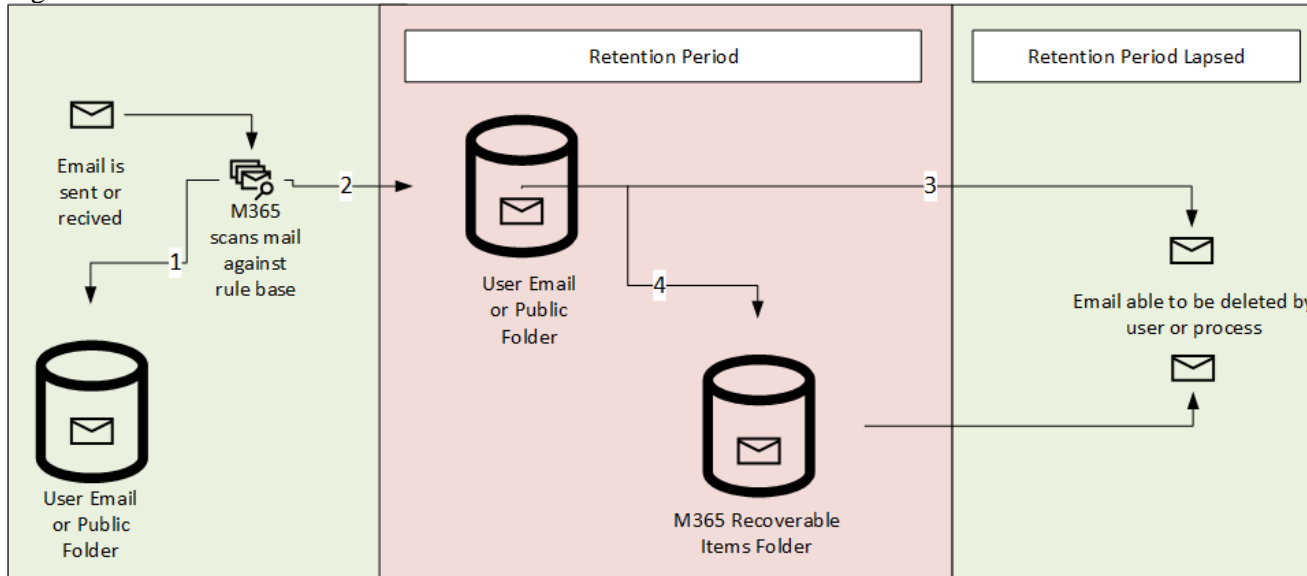


Figure – 1.1



- 1 – If the content contains PII or is not to / from a CCS user, No retention applied, email can be deleted
- 2 – If the content **does not** contain PII and is to / from a CCS user
- 3 – If the content is not modified or deleted during the retention period
- 4 – If the content is modified or permanently deleted by the during the retention period

Figure – 1.1.1

