Codema privacy policy - Legal basis and retention times

Processing Activity	Purpose of Processing	Legal Basis (GDPR)	Retention Period
Mailing list subscriptions	To inform subscribers about products, services, news and events that may be of interest	**Consent** (Article 6(1)(a)) – individuals opt-in to receive communications and may withdraw consent at any time	Until the individual **withdraws consent or unsubscribes**, or after **24 months of inactivity**
Event registrations	To manage event registrations, communicate with participants and administer the event	**Performance of a contract** (Article 6(1)(b)) or **Legitimate interests** (Article 6(1)(f)) in organising and managing events	**12 months after the event**, unless required longer for reporting obligations such as EU or national funded project
Recruitment (job applications, internships, work experience)	To assess candidates, manage recruitment processes and communicate with applicants	**Legitimate interests** (Article 6(1)(f)) in recruitment processes and **steps prior to entering into a contract** (Article 6(1)(b))	**12 months after the recruitment process ends** unless consent is obtained to retain longer for future roles
Surveys (e.g. Home Energy Saving Kit surveys)	To collect feedback and evaluate the effectiveness of products and services	**Legitimate interests** (Article 6(1)(f)) in improving services and programmes, or **Consent** where participation is voluntary	**24 months** after survey completion, unless anonymised earlier for statistical analysis
Project collaboration (national and EU projects)	To manage collaboration, communication and administration of projects and initiatives	**Performance of a contract** (Article 6(1)(b)) or **Legitimate interests** (Article 6(1)(f)) in delivering projects and initiatives	Duration of the project **plus up to 7 years** where required for audit, reporting, or funding compliance
Website cookies and analytics	To ensure website functionality, analyse usage and improve user experience	**Consent** (Article 6(1)(a)) for non-essential cookies; **Legitimate interests** (Article 6(1)(f)) for strictly necessary cookies	According to cookie type; typically **session duration to 12 months**