



CUSTOMERS & SUPPLIERS

DOCUMENT

By way of example and without limitation, some of the most significant documents are listed below. Invoices (issued by the company and charged against the company). Commercial contracts (sale and purchase, commission, transport, provision of services, etc.). Contracts with individuals. Real estate contracts (business premises leases, sale and purchase, exchange, etc.). Commercial correspondence. Banking contracts and documentation (current accounts, deposits, leasing, renting, etc.). Expense notes.

RETENTION

Obligation to retain documentation for a minimum period of 6 years. It is advisable to retain it depending on the applicable limitation period for legal actions. Article 30 of the Spanish Commercial Code establishes that business owners must keep books, correspondence, documentation, and supporting records related to their business for six years from the date of the last entry made in the books. However, this rule only establishes a minimum retention period during which merchants must preserve the documents generated in the course of their business activity in the interest of public policy.

DOCUMENT

Tax-relevant documents and records.

RETENTION

Spanish General Tax Law, Articles 66 to 70. 4 previous fiscal years.

DOCUMENT

Obligated entities under the Anti-Money Laundering Law, supporting documentation for compliance with AML obligations.

RETENTION

Law 10/2010, Article 25. 10 years.



HUMAN RESOURCES

DOCUMENT

Payrolls, TC1, TC2, etc.

RETENTION

10 years (Royal Legislative Decree 5/2000, of 4 August, approving the revised text of the Law on Infractions and Sanctions in the Social Order).

DOCUMENT

Curriculums.

RETENTION

Until the end of the recruitment process, and for up to 2 additional years unless the data subject withdraws consent or requests erasure.

DOCUMENT

Employee training.

RETENTION

Article 5.2 of Order TAS/2307/2007. 4 years.

DOCUMENT

Work Time Records.

RETENTION

Article 34.9 of Royal Legislative Decree 2/2015, approving the revised text of the Workers' Statute Law. 4 years.

DOCUMENT

Severance Compensation Documents.
Contracts.
Temporary Employees' Data.

RETENTION

Royal Decree 425/2005, section 3 of Additional Provision 1.
4 years.
Article 30 of the Spanish Commercial Code establishes a minimum retention period of 6 years. Organic Law 7/2012 recommends retaining it for 10 years.



HUMAN RESOURCES

DOCUMENT

Employee File.

RETENTION

Up to 5 years after termination of employment (Royal Legislative Decree 5/2000, of 4 August, approving the revised text of the Law on Infractions and Sanctions in the Social Order).

DOCUMENT

Documentation or digital records proving compliance with Occupational Risk Prevention regulations.

RETENTION

Royal Legislative Decree 5/2000, Article 4. 5 years.

MARKETING

DOCUMENT

Databases or website visitors.

RETENTION

For as long as the processing activity continues.



ACCESS CONTROL & VIDEO SURVEILLANCE

DOCUMENT

Visitor Log.

RETENTION

AEPD Instruction 1/1996. 30 days.

DOCUMENT

Video Surveillance.

Images captured by video surveillance systems will be retained for a maximum period of 30 days, in accordance with Article 22 of the Spanish Organic Law on Data Protection and Digital Rights Guarantee (LOPDGDD), unless they must be retained for a longer period due to their relation to events that may constitute criminal or administrative offences, or when required by Law Enforcement Authorities or judicial authorities.

In certain areas of the Casino, video surveillance systems may also serve the purpose of ensuring gaming transparency, compliance with applicable sector regulations, and the proper operation of gaming tables and devices, in accordance with regional gaming regulations.

RETENTION

Article 22 of the Spanish Organic Law on Data Protection and Digital Rights Guarantee (LOPDGDD).

ACCOUNTING

DOCUMENT

Accounting Books and Records. Annual Accounts.

Shareholders' and Board of Directors' resolutions, company bylaws, minutes, Board of Directors' regulations, and delegated committee regulations.

Financial statements and audit reports.

Records and documents related to grants and subsidies.

RETENTION

Spanish Commercial Code, Article 30. 6 years.



CORPORATE DOCUMENTATION

DOCUMENT

Deeds of incorporation of the company together with the company bylaws, deeds formalizing corporate resolutions, granting/renewal of powers of attorney, share purchase agreements, asset purchase agreements, share transfer deeds, dissolution/liquidation deeds, etc.

Minute books of shareholders' meetings and Board of Directors' meetings (commercial companies), registered shares ledger, shareholders' register book, register of contracts with the sole shareholder, and other corporate books.

Other types of corporate documentation (private share purchase agreements, participating loans, share pledges, etc.).

RETENTION

It is recommended to retain these documents throughout the entire lifespan of the company, from its incorporation until at least 6 years after its dissolution and liquidation. In cases where the deeds include rights or obligations for the company, it is recommended to comply with the previously indicated limitation periods.

Obligation to retain documentation for a minimum of 6 years from the date of the last entry made in the accounting books. These documents should be kept throughout the entire lifespan of the company, from its incorporation until at least 6 years after its dissolution and liquidation.

It is recommended to retain them throughout the entire lifespan of the company, from its incorporation until at least 6 years after its dissolution and liquidation.



TAX / TRIBUTARY

DOCUMENT

Management and administration of the entity, rights and obligations related to tax payments.

Administration of dividend payments and tax withholdings.

All documents supporting the taxpayer's tax-related activities (proof of income and expenses), including accounting records and supporting documentation (contracts, invoices, receipts, delivery notes, etc.). All types of tax returns and filings.

RETENTION

Obligation to retain documentation: Minimum 4 years. Articles 66, 67, and 68 of the Spanish General Tax Law establish that the general limitation period for tax obligations is 4 years. Regarding tax returns, this 4-year limitation period begins on the day following the end of the voluntary filing period for the relevant tax.

If there has been a subsequent action by the Administration (inspection, partial review) or by the taxpayer (amended return, appeal) interrupting the limitation period, a new 4-year period begins from that action.

However, it is advisable to retain tax documentation for 10 years, as recommended by Organic Law 7/2012.

Order EHA/962/2007 provides for the possibility of destroying paper invoices if a certified digitalization process has previously been carried out, generating digitally signed electronic copies.

HEALTH & SAFETY

DOCUMENT

Employees' Medical Records / Spa Clients' Health Data (treatments) / Medical Records.

RETENTION

Article 17.1 of Law 41/2002, of 14 November, on Patient Autonomy and Rights and Obligations regarding Clinical Information and Documentation.

5 years.



INSURANCE

DOCUMENT

Insurance Policies.

RETENTION

6 years (general rule). 2 years (damages).

5 years (personal insurance). 10 years (life insurance).

LEGAL

DOCUMENT

Intellectual and Industrial Property Documents.

Contracts and agreements.

RETENTION

5 years.

DOCUMENT

Permits, licenses, certificates.

RETENTION

6 years from the expiration date of the permit, license, or certificate.

10 years (criminal statute of limitations).

DOCUMENT

Confidentiality and non-compete agreements.

RETENTION

For the entire duration of the obligation or confidentiality requirement.



DATA PROTECTION REGULATIONS

DOCUMENT

Records and documents proving compliance with data protection regulations (audits, reports, data processing agreements, etc.).

RETENTION

For the duration of the data processing activity and for an additional 3 years thereafter.

DOCUMENT

Documentation proving that requests for the exercise of data subjects' rights are properly handled.

RETENTION

For 3 years after the request.

DOCUMENT

Logs / Records of access to information systems.

RETENTION

2 years.

DOCUMENT

If the processing is based on the data subject's consent, proof of consent.

RETENTION

For the duration of the data processing activity and for an additional 3 years thereafter.

TRAFFIC DATA RELATED TO INTERNET CONNECTIONS, EMAILS & LANDLINE CALLS

DOCUMENT

User identifier, IP address (source/destination), telephone number, IMSI and IMEI (source/destination), date and time of the communication (start/end), identification of the type of service or communication used (voice, data, SMS or MMS).

RETENTION

Article 5 of Law 25/2007 on the retention of data relating to electronic communications and public communications networks.
1 year.



BIOMETRIC DATA UNDER THE GUIDELINES PUBLISHED BY THE AEPD

DOCUMENT

Biometric data is recorded in the tool/software enabled for this purpose by the entity, provided that a positive Impact Assessment has been carried out within the applicable legal framework.

RETENTION

In compliance with the principle of storage limitation, personal data may not be processed for longer than necessary for the purposes of the processing activity. Therefore, taking into account the provisions of Article 34.9 of the Workers' Statute, the company will retain the records for four years, during which they shall remain available to employees, their legal representatives, and the Labour and Social Security Inspectorate. The user shall be responsible for notifying and initiating the definitive deactivation procedure.

Building access control: 30 days, files used to control access (AEPD Instruction 1/1996).

INACTIVE FINGERPRINTS: 6 MONTHS OF INACTIVITY.

RECORDS: EMPLOYEES, 4 YEARS; NON-EMPLOYEES, 30 DAYS.

GUESTS

DOCUMENT

Traveller/Guest Check-in Registration Record.

RETENTION

3 years (Organic Law 4/2015 on the Protection of Public Security, Order INT/1922/2003, and Royal Decree 933/2021, of 26 October, regarding documentary registration and information obligations for individuals or legal entities carrying out accommodation activities).