

Data Retention and Deletion Policy

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1. Purpose

Defines retention, archival, and deletion rules for personal data processed in Spelling Mastery.

2. Principles

- Data minimization
- Storage limitation
- Secure deletion
- Controller instruction priority
- Legal hold exception handling

3. Standard Retention Schedule (Default)

Data Category	Default Retention	Deletion Method
Student account profile	Contract term + [30] days	Hard delete or irreversible anonymization
Learning progress/attempt records	Contract term + [30] days	Hard delete or irreversible anonymization
Authentication logs	[30-90] days	Rolling deletion
Audit logs for admin actions	[12] months	Rolling deletion, unless legal hold
Backup copies	[30-90] days	Automated expiry and purge

Controller-specific retention can override defaults in contract/DPA instructions.

4. Deletion Triggers

- Controller request (manual or scheduled)
- Contract termination
- Expiry of retention period
- Data correction replacement with superseding record

5. Deletion Workflow

1. Request logged and authorized.
2. Target dataset identified by tenant/school scope.
3. Deletion executed in production data stores.
4. Deletion propagated to derived stores/caches.
5. Backup expiry lifecycle applied.
6. Completion confirmation provided to controller.

6. Legal Hold Exception

Where deletion conflicts with legal obligation or active dispute hold:

- data is isolated/restricted,
- retention reason is documented,
- deletion resumes when hold is released.

7. Verification

Deletion jobs are logged and periodically sampled to verify completion and scope correctness.

8. Controller Communication

On request, processor provides:

- deletion confirmation,
- record categories affected,
- completion timestamp,
- exceptions (if any) and rationale.