

Data Retention and Disposal of Customer Data

This policy describes Rewind's processes for the retention of and secure disposal of customer data.

1. Purpose

The purpose of this policy is to present Rewind's process for the retention and disposal of customer data.

2. Scope

This policy applies to the retention and disposal of customer data including all Rewind platforms where Customer Content is processed to provide Rewind's backup services.

3. Definitions

- **Customer Data:** the data of our customers and may include Customer Content, Customer Account Data and/or Customer Usage Data.
 - **Customer Content:** all the content in the account that the Customer has with the applicable Cloud Service Provider that Rewind backup (also called Customer Backups).
 - **Customer Account Data:** data that relates to the Customer's relationship with Rewind. This may include personal data or business contact data, including the names or contact information of individuals authorized by Customer to access Customer's account, and billing information, or data contained within support tickets.
 - **Customer Usage Data:** data that relates to the usage of the Rewind platforms by individuals. This includes data in activity logs used to identify the source of system actions, optimize, and maintain performance of the services, and investigate and prevent system abuse. This may include personal data such as username, user email address or IP address.
 - **Inactive Customer:** a Customer who, following termination, no longer has access to Rewind's services.
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4. Retention of Customer Content

Customer Content is retained in accordance with the schedule provided below.

4.1 Inactive Accounts

Data for all Rewind's inactive customer accounts is purged after 90 days of account termination.

4.2 Active Accounts

Data for active Rewind accounts is retained according to the following:

- The latest version(s) of any objects backed up (product, image, etc.) are retained for as long as the customer account is active.
- The previous version(s) of any objects backed up are retained for 365 days.

Although data may be retained up to 365 days, the availability of data for restorations is determined by platform and customer plan. Please see your platform documentation for details specific to your plan.

For example, the availability of data for backups of the Github platform are dependent on the customer plan:

- **Pro Plans:** 30 days
- **Enterprise Plans:** 365 days

5. Retention of Customer Account Data

Rewind will retain Customer Account Data according to the purpose for which it was collected and for as long as we have a legitimate interest for the processing. This can include customer relationships, direct marketing, to prevent fraud, or to ensure the network and information security of our IT systems.

Rewind may aggregate or anonymize Customer Account Data following termination of account.

6. Retention of Customer Usage Data

Rewind will retain Customer Usage Data according to the purpose for which it was collected and for as long as we have a legitimate interest for the processing. Typically, Customer Usage Data is deleted after a period of one year.

In some cases, we may retain and process Customer Usage Data to carry out necessary functions of our business. It is possible that legal matters may require us to preserve records, these matters may include litigation, or law enforcement requests.

Rewind may aggregate or anonymize Customer Usage Data following termination of account.

Rewind reserves the right to change this policy at any time.

Record of Revisions

Revised on	February 28, 2024
Description	Added definitions for types of customer data, added details on the retention and disposal of customer data, updated to reflect changes in retention and availability of data. Made changes for clarity and accuracy.
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Appendix

Temporary Exception of Retention for GitHub Backups

Rewind customers who utilize GitHub Backups, who are being transitioned from the legacy BackHub system will have their data stored on the legacy system retained for 30 days (Pro Customers) or 365 days (Enterprise Customers), after which time it will be securely deleted. Following the deletion of data from the legacy system, GitHub Backups customers shall follow the same retention schedule as all other Rewind customers.

This exception will remain in effect for as long as this appendix exists.

A large, light gray decorative graphic in the bottom right corner, consisting of several overlapping curved shapes that resemble a stylized 'R' or a series of arcs.