Data Retention and Disposal of Customer Data

Rewind

Record of Revisions

Prior to February 2024, all revisions made to policies were recorded independently outside of the Rewind Policy. Future revisions will be documented within the policy document.

Revised On	Description	Author(s)	Approver(s)
February 28, 2024	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.	Margaret Corcoran, Data Protection and Privacy Specialist	Megan Dean, Director, Security
July 25, 2024	Added retention information for Rewind Staging.	Margaret Corcoran, Data Protection and Privacy Specialist	Dave North, VP, Cloud Operations in Engineering - CloudOps
Aug 19, 2024	Corrected a grammatical error	Margaret Corcoran, Data Protection and Privacy Specialist	Siobhan Devlin, Chief Legal Officer
April 10, 2025	Removed outdated information and updated document classification	Margaret Corcoran, Data Protection and Privacy Specialist	Dave North, VP, Cloud Operations and Security in Engineering

Data Retention and Disposal of Customer Data

This policy outlines Rewind's approach to retaining and securely disposing of customer data.

Data Retention and 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 services.

3. Definitions

- Customer Data - means the data of our customers and may include Customer Content, Customer Account Data and/or Customer Usage Data
- Customer Content – means 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 - means 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- means 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 - means a Customer who, following termination, no longer has access to Rewind's services.
- Transitory Data - means the systems data of temporary usefulness generated for, or resulting from, the use of Rewind services Rewind Staging

4. Retention of Customer Content in Rewind Backups

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

4.1 Inactive Accounts

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

4.2 Active Accounts

Customer Content 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 Customer Content may be retained up to 365 days, the availability of Customer Content 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 Content in Rewind Staging

5.1 Inactive Accounts

Rewind does not retain Customer Content copied during the use of Rewind Staging.

5.2 Active Accounts

Rewind does not retain Customer Content copied during the use of Rewind Staging, however Rewind may retain Transitory Data created during the copying process. This Transitory Data is retained for a period of 7 days.

6. 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.

7. 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.