

Data Retention Policy

Version	2.1
Implementation Date	2014/08/01
Review Date	2024/10/22
Confidentiality	Public
Distribution	Dot.vu, Dot.vu Clients
References	https://dot.vu/dpa

This is a redacted version of Dot.vu's Data Retention Policy. Certain details, including metadata and change logs, have been omitted for privacy and security reasons.

Contents

Contents	2
1. Purpose	3
2. Scope.....	3
3. Responsibilities	3
4. Policy.....	4
4.1. Business Data	4
4.2. Collected Data	4
4.2.1. For Free or Trial Subscriptions	4
4.2.2. For Paid Subscriptions	4
4.2.3. Post-Cessation Period.....	4
4.3. Analytics Data	4
4.3.1. For Free or Trial Subscriptions	4
4.3.2. For Paid Subscriptions	5
4.4. Security.....	5
4.4.1. Encryption at Rest.....	5
4.4.2. Weekly Compactions.....	5
4.4.3. Regular Audits.....	5
4.5. Backups and Recovery Procedures	5
4.5.1. Nightly Backups.....	5
4.5.2. Recovery Procedures	5

1. Purpose

The purpose of this Data Retention Policy is to establish clear guidelines for the retention and deletion of data across Dot.vu's subscription services. This policy aims to enhance compliance with data protection regulations, including but not limited to GDPR and CCP, by automating data retention processes and ensuring that data is managed responsibly throughout its lifecycle.

2. Scope

This policy applies to all data collected and processed under Dot.vu's subscriptions, including Business Data, Audience Data and Analytics Data. It is relevant to all Dot.vu employees, partners, and clients who handle or manage such data.

3. Responsibilities

All staff are required to adhere to established data retention schedules and deletion protocols. The Data Protection Officer (DPO) ensures policy compliance and alignment with legal requirements. The IT Department is responsible for the technical implementation of data handling and deletion procedures, while the Legal and Compliance teams verify the policy's conformity with legal standards. Management is tasked with providing the necessary resources to support and enforce the policy.

4. Policy

4.1. Business Data

Business Data encompasses account details, including admin users (names, emails, roles), projects, uploaded media, and all associated settings and configurations. It also includes data provided through mailing list subscriptions. This information is retained as long as the data owner maintains an active account with Dot.vu or subscribes to the respective newsletter. The data will be deleted upon explicit request for account or data deletion.

4.2. Collected Data

Collected Data is all data collected through interactive experiences created with Dot.vu. It is automatically deleted after the configured retention period.

4.2.1. For Free or Free Trial Subscriptions

Collected Data is retained for 6 months.

4.2.2. For Paid Subscriptions

Collected Data is retained for 1 year, and this value can be adjusted to a maximum value of 1 year.

4.2.3. Post-Cessation Period

The default post-cessation of contract period is 6 months. This value can be adjusted to a maximum value of 1 year for paid subscriptions.

4.3. Analytics Data

Analytics Data is any performance data collected via interactive experiences. It is automatically deleted after the configured retention period.

4.3.1. For Free or Free Trial Subscriptions

Analytics Data is retained for 6 months.

4.3.2. For Paid Subscriptions

Analytics Data is retained for 2 years.

4.4. Security

4.4.1. Encryption at Rest

Dot.vu can encrypt data at rest as an added service available to all paid subscriptions. The data is encrypted using AES-256-CBC where key management and initialization vector (IV) are handled by our IaaS provider Rackspace Technology, to ensure the highest level of security.

4.4.2. Weekly Compactions

Compactions are run weekly to reorganize and optimize storage, reducing the likelihood of residual data being recoverable and enhancing overall database performance and security.

4.4.3. Regular Audits

We regularly monitor and audit encryption and compaction processes to ensure there are no gaps in our data protection strategy, maintaining compliance with data protection regulations and internal security policies.

4.5. Backups and Recovery Procedures

4.5.1. Nightly Backups

Nightly backups are performed and retained for up to 10 days. These backups are encrypted to ensure the security of stored data.

4.5.2. Recovery Procedures

In the event of a recovery, Dot.vu will ensure that any data previously deleted is re-deleted in accordance with our data deletion policies, preventing the restoration of unintended data.