

Data Retention & Deletion Policy

Version: 1.0 (template) · **Effective date:** [DATE] · **Operator:** [LEGAL ENTITY NAME] (Soola)

Template — not legal advice. Review with qualified Indonesian counsel before use.

Principle

We keep personal data only as long as needed to provide the service or to meet legal obligations, then delete or anonymise it. Each school's data lives in its **own database**; deleting a school deletes its data.

Retention schedule

Data	Default retention	Notes
Account & membership	While the user is active at the school + [12] months	Then deleted/anonymised
Academic records (assignments, grades, attendance)	Per school policy / academic year + [school-defined]	Controller-configurable
Messages & announcements	[12] months or per school	Controller-configurable
Uploaded materials & submissions	While the class is active + [school-defined]	Stored privately in R2
Live recordings	[30] days (configurable per school)	Auto-deleted after the window; can tier to cold storage
Audit & security logs	[12–24] months	For security & accountability
Payment records (Phase 2)	As required by Indonesian tax/accounting law	Typically [10] years for invoices
Backups	[30] days rolling	Then overwritten

Triggers for deletion

- **Student/parent removed** from the school → their personal data is deleted/anonymised per schedule.
- **Consent withdrawn for live video** → live access stops immediately; related recordings deleted within the retention window.
- **School offboarding** → the school's entire database is deleted within **[30] days** (subject to legally-required retention).

- **Data-subject erasure request** (via the school) → actioned within **[30] days**, subject to legal exceptions.

How deletion works

Deletion removes data from the live database and storage; backups expire on the rolling schedule above. Deletion is recorded for accountability. Recordings in R2 are removed by an automated retention job.

Contact

Requests and questions: **[DPO/CONTACT EMAIL]**.