

Data Retention Policy

Jumbula

Purpose

This policy outlines the requirements and controls/procedures Jumbula has implemented to manage the retention and deletion of data.

Policy

For Customers

Customer data related to user profiles are retained for as long as the account is in active status. Customer data related to transactions are retained only for five years if the account is in active status. Data enters an “expired” state when the account is voluntarily closed. Expired account data will be retained for **30 days**. After this period, the account and related data will be removed. Customers that wish to voluntarily close their account should download their data manually or via the API (if applicable) prior to closing their account.

If a customer account is involuntarily suspended, then there is a **10-day** grace period during which the account will be inaccessible but can be reopened if the customer meets their payment obligations and resolves any terms of service violations.

If a customer wishes to manually backup their data in a suspended account, then they must ensure that their account is brought back to good standing so that the user interface will be available for their use. After **14 days**, the suspended account will be closed and the data will enter the “expired” state. It will be permanently removed **30 days** thereafter (except when required by law to retain).

Appendix A: Data Retention Schedule

CATEGORY TYPE	OWNER	
Customer Data		
DATA TYPE	STORAGE LOCATION	RETENTION PERIOD

CATEGORY TYPE	OWNER	
DATA TYPE	STORAGE LOCATION	RETENTION PERIOD

Revision History

Version	Date	Editor	Approver	Description of Changes	Format
1.0	September 13, 2022	Hassan Feghhi	Hassan Feghhi	Initial Creation	Electronic
2.0	April 07, 2024	Omid Soleymanpoor	Hassan Feghhi	Renewal and revision	Electronic
5.0	April, 06 2025	Jalil Feghhi	Hassan Feghhi	Updated: Customer data related to user profiles are retained for as long as the account is in active status. Customer data related to transactions are retained only for five years if the account is in active status	Electronic

Policy version history

Policy details

Policy name	Renewal date
--------------------	---------------------

Data Retention Policy	April 5, 2026
-----------------------	---------------

Description

The Data Retention Policy is the documentation that our company has created to stipulate when data no longer serves its purpose and should be deleted, or if the data retention period has been met.

Version history

Version 1

Creation date	Approval date	Published date	Owner	Approver	Publisher
April 29, 2023	April 29, 2023	April 29, 2023	Jalal Feghhi	Jalal Feghhi	Jalal Feghhi

Version 2

Explanation of changes

Renewal and revision

Creation date	Approval date	Published date	Owner	Approver	Publisher
April 7, 2024	April 7, 2024	April 7, 2024	hassan feghhi	hassan feghhi	hassan feghhi

Version 3

Explanation of changes

Changed retention from 60 to 30 days.

Creation date	Approval date	Published date	Owner	Approver	Publisher
October 2, 2024	October 3, 2024	October 3, 2024	hassan feghhi	hassan feghhi	hassan feghhi

Version 4

Explanation of changes

Changed data retention from 60 to 30 days in one more place.

Creation date	Approval date	Published date	Owner	Approver	Publisher
October 12, 2024	October 14, 2024	October 14, 2024	Jalil Feghhi	hassan feghhi	hassan feghhi

Version 5

Explanation of changes

Customer data related to user profiles are retained for as long as the account is in active status. Customer data related to transactions are retained only for five years if the account is in active status

Creation date	Approval date	Published date	Owner	Approver	Publisher
April 6, 2025	April 6, 2025	April 6, 2025	Jalil Feghhi	Jalil Feghhi	Jalil Feghhi
