## **Jumbula Data Retention Policy**

## **Purpose**

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

## **Active Accounts**

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 up to 7 years. Certain categories are retained for **1 year**, as detailed in the table below:

Data Type	Retention Period	Notes
Email Attachments	1 year	Attachments sent via email by Jumbula - such as reports, calendars, uploaded documents, and photos - will be deleted 1 year after the email is generated.  Reports may be regenerated after deletion if needed.
Email campaign reports and recipients	2 years	Email campaign reports and associated recipient data will be deleted 2 years after the campaign creation date and cannot be recovered once removed.  The campaign body will be retained and may be reused for future campaigns.
Customer Data – User Profiles	Never	Never as long as account is active.
Customer Data – Transactions	7 years	Data not mentioned above.

## **Closed Accounts**

Data enters an "expired" state when the account is voluntarily closed. Expired account data will be retained for 30 days. After this period, all 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).