Data Retention and Deletion Policy

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Approved By: Chief Information Security Officer (CISO)**

1. Purpose

This policy establishes Orbitel.ai's approach to retaining and securely disposing of data.
It ensures compliance with applicable privacy, regulatory, and contractual obligations while optimizing storage efficiency and minimizing unnecessary data retention.

2. Scope

Covers:

- All data collected, processed, or stored by Orbitel, including customer data, employee data, logs, and system backups.

- Data stored in cloud environments, SaaS systems, and physical media.

3. Retention Principles

Orbitel follows the principle of **data minimization** — keeping information only as long as necessary for its intended purpose.
Retention periods are determined by:

- Legal and regulatory obligations (e.g., tax, audit, or security requirements).

- Contractual commitments to customers or partners.

- Legitimate business or operational needs.

4. Policy Statements and Controls

a. Data Categorization and Timelines

- **Customer Account Data:** Retained for the duration of the contract and up to 90 days post-termination unless otherwise requested.

- **System Logs and Security Events:** Retained for 12 months for audit and forensic review.

- **Backups:** Retained for 30–90 days in encrypted form.

- **Anonymized Analytics Data:** Retained indefinitely for research and system improvement.

b. Secure Disposal

- Data deletion processes are irreversible, using secure wipe or cryptographic erasure methods.

- When records are no longer required, they are securely purged from all active systems and backups within defined retention windows.

c. Backup and Restoration Alignment
Deleted data is also purged from subsequent backup cycles. Restoration requests must align with data minimization principles.

5. Roles and Responsibilities

- **Data Protection Officer (DPO):** Oversees compliance with retention and deletion requirements.

- **Engineering Teams:** Implement automated deletion mechanisms.

- **Security and IT Teams:** Ensure secure disposal of media and hardware.

6. Compliance and Continuous Improvement

Orbitel periodically reviews retention periods against evolving legal and business requirements.
Annual audits verify that data deletion and retention controls remain effective.