

Refyn: Data Retention Schedule

Effective Date: July 12, 2025

This Data Retention Schedule outlines how long Refyn, operated by Paul Vincent, retains different categories of personal data collected through the Refyn application and website (the "Service"). Our data retention practices comply with the UK GDPR's storage limitation principle, which requires that personal data is not kept for longer than is necessary for the purposes for which it is processed.

We regularly review the data we hold and securely erase or anonymize it when it is no longer needed, unless a legal obligation requires us to retain it for a longer period.

1. Data Retention Principles

- **Purpose Limitation:** Data is retained only for the specific purposes for which it was collected.
- **Data Minimization:** We do not retain data for longer than necessary.
- **Legal Compliance:** Retention periods are aligned with legal and regulatory obligations (e.g., tax, accounting).
- **User Rights:** We have processes in place to comply with individuals' requests for erasure.
- **Secure Disposal:** Data is securely deleted or irreversibly anonymized when its retention period expires.

2. Data Retention Table

Data Category	Purpose for Retention	Retention Period	Justification/Legal Basis	Deletion/Anonymisation Method
User Account Information (Name, Email, Contact Details)	Account management, service provision, communication, dispute resolution.	Account active + 6-12 months post-closure	Contractual Necessity, Legitimate Interests (for administrative purposes, dispute resolution).	Secure deletion from active and backup systems.
Uploaded Artwork Files (Paid Tier)	Providing AI feedback, generating notes, fulfilling service contract.	30 days after subscription cancellation (if no re-subscription)	Contractual Necessity, User Query, Data Minimization.	Secure deletion from Replit database and associated backups within 30 days.
Uploaded Artwork Files (Free Tier)	Providing AI feedback, generating notes, fulfilling service contract.	As long as the account remains active. If account becomes inactive for 12 months, files may be deleted.	Contractual Necessity, Data Minimization.	Secure deletion from Replit database.

Data Category	Purpose for Retention	Retention Period	Justification/Legal Basis	Deletion/Anonymisation Method
AI-Generated Feedback & Notes	Providing service, historical reference for user, service improvement.	Linked to original artwork file retention. For model improvement, disconnected copies may be stored for up to 18 months (with opt-out for OpenAI).	Contractual Necessity, Legitimate Interests (with opt-out for model improvement).	Secure deletion or irreversible anonymisation when associated artwork is deleted or retention period expires.
Location Data	Enabling cultural discovery feature.	During active user session; immediately after use.	Consent, Data Minimization.	Anonymisation or secure deletion after immediate use.
Payment Transaction Records (e.g., subscription history, amounts paid)	Financial accounting, tax compliance, fraud prevention.	6-7 years from transaction date	Legal Obligation (UK tax and accounting laws).	Secure deletion of financial records.
Usage Data (Device info, IP, interactions, analytics)	Service improvement, analytics, security monitoring.	Up to 2 years (anonymized after 1 year)	Legitimate Interests.	Anonymisation for long-term analytics; secure deletion of identifiable data.
Communication Information (Emails, support tickets)	Customer support, dispute resolution, record-keeping.	2 years from last interaction	Legitimate Interests.	Secure deletion.

3. Anonymisation vs. Deletion

In some cases, instead of outright deleting personal data, we may irreversibly anonymize it. Anonymisation means that the data can no longer be linked to an identifiable individual. Anonymized data may be retained for longer periods for statistical, research, or service improvement purposes, as it no longer constitutes personal data under UK GDPR.

4. Review of Retention Schedule

This Data Retention Schedule will be reviewed periodically, at least annually, or whenever there are significant changes to our data processing activities or relevant legal requirements.