

# Data Deletion Policy

<b>Document</b>	Data Deletion Policy
<b>Version</b>	1.9
<b>Effective</b>	07 May 2026
<b>Operated by</b>	Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta
<b>Scope</b>	All personal data processed through the Azulkey CRM platform
<b>Jurisdiction</b>	Malta / European Union (GDPR) and Meta Platform Terms and Developer Policies

## 1. Purpose

This policy describes how Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta, operating the Azulkey CRM platform ('Azulkey'), handles requests for the deletion of personal data, including requests from individual data subjects, from Agencies, from Solo Agents, and automated deletion requests received from Meta Platforms Inc. via the Data Deletion Callback mechanism required by Meta's Platform Terms and Developer Policies.

Azulkey currently processes Meta platform data from Facebook Messenger and Instagram. Azulkey also processes email addresses for outbound and inbound transactional messaging. This policy will be updated before any materially different new channel goes live (such as WhatsApp Business API or TikTok).

Azulkey is committed to honouring deletion rights promptly and maintaining a transparent, auditable process.

### How to request deletion of your data

<b>By email</b>	privacy@azulkey.com — no login required
<b>Via Meta platforms</b>	Revoke Azulkey's permissions on Facebook or Instagram — an automated deletion request is sent to us immediately
<b>Via the Agency</b>	Contact the real estate agency that collected your data — they can initiate deletion directly from within Azulkey
<b>Via your Solo Agent</b>	If your data was collected by an independent Solo Agent, contact them directly or email privacy@azulkey.com

No account or login is required to submit a deletion request by email or through Meta. We will acknowledge all requests within 3 business days and complete deletion within 30 days.

## 2. Types of Deletion Request

<b>Manual — Data Subject</b>	An individual (lead or property owner) requests erasure of their data directly via email or through the Agency or Solo Agent.
<b>Manual — Agency</b>	An Agency Owner or Agency Agent initiates deletion from within the Azulkey platform (the 'Forget Me' function).
<b>Manual — Solo Agent</b>	A Solo Agent initiates deletion of one of their own lead records using the 'Forget Me' function.
<b>Automated — Meta</b>	Meta sends a signed deletion request to our callback endpoint when a user revokes Azulkey's permissions on Facebook or Instagram.
<b>Automated — Retention</b>	Our system automatically deletes or anonymises data that has been inactive for 36 months, logging event type 'auto_deletion_36mo' (see Retention Policy).

### 3. Manual Deletion Process

#### 3.1 How to Submit a Request

Data subjects may request deletion of their personal data by:

- Emailing [privacy@azulkey.com](mailto:privacy@azulkey.com) with the subject line 'Erasure Request'
- Contacting the Agency that collected their data directly
- Contacting the Solo Agent that collected their data directly
- For platform users (agents): submitting a request through the Azulkey account settings

#### 3.2 Verification

To protect data subjects from fraudulent deletion requests, Azulkey verifies the identity of the requester before processing deletion. Verification methods include:

- Email confirmation from the address on record
- Provision of a unique reference number (lead ref or owner ref)
- For Agencies and Solo Agents: authentication via the Azulkey dashboard

#### 3.3 Processing Timeline

<b>Acknowledgement</b>	Within 3 business days of receiving a verified request.
<b>Deletion completed</b>	Within 30 days of verification (typically within 5 business days for platform-initiated requests).
<b>Confirmation</b>	Written confirmation sent to the requester upon completion.
<b>Extension</b>	We may extend the deadline by up to 2 months for complex requests, with written notice to the requester.

#### 3.4 What Is Deleted

Upon a valid erasure request, the following data is permanently deleted for the relevant data subject:

- Full name (replaced with '[DELETED]')
- Phone number
- Email address
- Message history and conversation content
- Notes and free-text fields
- Property links and associated documents

The following is retained as required by law:

- Anonymised pipeline record (stage, dates, channel — no personal identifiers)
- GDPR audit log entry recording the erasure event, with timestamp and operator reference
- Suppression record (minimal identifier stored to prevent re-import of deleted data)

## 4. Meta Platform Data Deletion Callback

In accordance with Meta's Platform Terms and Developer Policies, Azulkey implements an automated Data Deletion Callback endpoint. This mechanism allows Meta to send signed deletion requests when a user revokes the Azulkey app's permissions or requests data deletion through Facebook or Instagram.

### 4.1 Public Data Deletion Request (Facebook and Instagram Users)

If you are a user who has interacted with an Agency or Solo Agent via Facebook or Instagram, you can request deletion of your data in any of the following ways:

- Revoke Azulkey's permissions directly within your Facebook or Instagram account settings — Meta will automatically send a deletion request to Azulkey on your behalf
- Email [privacy@azulkey.com](mailto:privacy@azulkey.com) with the subject line 'Erasure Request' — no account or login is required
- Contact the Agency or Solo Agent that collected your data — they can initiate deletion directly from within the Azulkey platform

When a deletion request is received, Azulkey will:

- Receive the request from Meta or directly from you
- Identify all personal data associated with your identifier
- Delete or anonymise all associated personal data from our systems
- Log the request in the GDPR audit log
- Return a confirmation response to Meta, or send a confirmation email if the request was made directly

If additional verification is required to process a direct request, Azulkey may contact the requesting user or the Agency. No login is required to submit a deletion request.

### 4.2 Callback Endpoint (Technical)

<b>Endpoint URL</b>	https://zopovsvqtqykithmghmt.supabase.co/functions/v1/meta-data-deletion
<b>Method</b>	POST
<b>Authentication</b>	Signed request verified using SHA-256 HMAC against the app secret
<b>Response</b>	JSON object: { url: , confirmation_code: }

### 4.3 Automated Processing Flow

When a valid deletion callback is received from Meta:

- Step 1 — Verify: Request signature validated against the app secret — spoofed requests are rejected
- Step 2 — Identify: Meta user ID matched to stored lead records via message history and external identifiers
- Step 3 — Delete: All messages, activity records and property links for the lead are permanently deleted
- Step 4 — Anonymise: Lead record anonymised — name, phone, email and notes are replaced with null values
- Step 5 — Suppress: A minimal identifier record is added to the suppression list to prevent re-import
- Step 6 — Log: GDPR audit log entry created with event type 'erasure\_request'
- Step 7 — Confirm: Confirmation URL returned to Meta within 72 hours

### 4.4 Status Tracking

Users who submit a deletion request through Facebook or Instagram can verify the status of their request using the confirmation URL returned by Azulkey. This URL displays the current status of the deletion (completed or failed) and is accessible without logging in.

## 5. Suppression List

To prevent accidental re-import of deleted data, Azulkey maintains a suppression list. When a lead or owner record is deleted, minimal identifiers (such as email address or phone number) are stored in a restricted suppression table accessible only to system administrators and the relevant Agency or Solo Agent. If an Agency or Solo Agent attempts to import a record matching a suppressed identifier, the system will block the import and alert them.

The suppression list is subject to access controls enforced at the database layer (Row-Level Security). Only the Agency or Solo Agent that originally held the data can view their own suppression entries. Azulkey is actively working to replace raw identifier storage with one-way SHA-256 hashes as part of ongoing privacy-by-design improvements, in accordance with the GDPR principle of data minimisation.

## 6. Platform-Initiated Deletion (Forget Me Function)

Agency Owners, Agency Agents, and Solo Agents can initiate the erasure of a lead's personal data directly from within the Azulkey platform using the 'Forget Me' function. Solo Agents have the same access to this function as Agency Owners. This function:

- Permanently deletes all message history for the lead
- Removes all property links associated with the lead

- Anonymises the lead record (name, phone, email, notes)
- Sets consent status to 'opted\_out'
- Creates an audit log entry recording the action, the operator, and the timestamp

This action is irreversible. Agents are presented with a confirmation dialog before proceeding.

## 7. Right to Object and Restriction

Where a data subject exercises their right to restrict processing rather than requesting full erasure, Azulkey will flag the relevant record to prevent further use in communications or data exports, while retaining the record in a restricted state. Full erasure may be requested at any time thereafter.

## 8. Retention of Audit Logs

GDPR audit logs recording deletion events are retained for 7 years in accordance with applicable law. These logs contain only anonymised identifiers (reference numbers such as 'RC-2026-00123'), event type, timestamp, and operator ID. They do not contain personal data and cannot be used to reconstruct deleted records.

## 9. Contact

<b>Legal name</b>	Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta
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<b>Meta callback technical</b>	tech@azulkey.com
<b>Postal address</b>	Malta