

Data Retention Policy

Document	Data Retention Policy
Version	1.9
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Operated by	Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta
Scope	All personal data processed through the Azulkey CRM platform
Jurisdiction	Malta / European Union (GDPR)

1. Purpose and Principles

This policy sets out how long Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta, operating the Azulkey CRM platform ('Azulkey'), retains different categories of personal data and what happens when that period expires. Our retention approach is guided by the GDPR principle of storage limitation (Article 5(1)(e)): personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which it was collected.

Azulkey currently processes personal data received via Facebook Messenger, Instagram, and email. As additional materially different channels are integrated in future (such as WhatsApp Business API and TikTok), this policy will be updated accordingly before those channels go live.

Azulkey operates an automated retention management system that enforces these periods without requiring manual intervention from Agencies or agents. All automated actions are recorded in the GDPR audit log.

2. Retention Schedule

Two parallel retention rules apply to lead and owner data. They operate simultaneously, not sequentially:

- **Subscription-based rule:** Active lead and owner data is retained while the Agency's or Solo Agent's subscription is active. Upon termination of the subscription, all remaining personal data is deleted or anonymised within 90 days, unless otherwise required by law.
- **Inactivity-based rule:** Regardless of subscription status, records that show no activity for 24 months are flagged for review, and records inactive for 36 months are automatically deleted or anonymised (logged as event type 'auto_deletion_36mo'). This rule applies during the subscription and acts as an additional safeguard to avoid retaining stale data indefinitely.

In practice this means a lead record will be deleted or anonymised at whichever comes first: 90 days after subscription termination, or 36 months of inactivity — whichever is the earlier trigger.

Category	Retention Period / Trigger
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Active lead records	While Agency's or Solo Agent's subscription is active. Deleted/anonymised within 90 days of subscription termination.
Active owner records	While Agency's or Solo Agent's subscription is active. Deleted/anonymised within 90 days of subscription termination.
Message history	Same as the associated lead record
24-month inactivity flag	Leads/owners with no activity for 24 months are flagged and the Agency Owner or Solo Agent is notified — no data deleted at this stage
36-month anonymisation	Leads/owners inactive for 36 months are automatically deleted or anonymised (event type: 'auto_deletion_36mo') — applies in parallel with the subscription rule
Platform user accounts	Retained while the Agency's or Solo Agent's subscription is active; deleted 90 days after account deactivation
GDPR audit logs	7 years from the date of the logged event
Billing records	7 years from invoice date (Malta accounting regulations)
Invitation tokens	72 hours from creation (or immediately upon acceptance)
Session tokens	24 hours from issuance
Suppression hashes	Indefinitely (to prevent re-import of deleted data)

3. The 24-Month Inactivity Flag

3.1 Trigger

A lead or owner record is considered 'inactive' if its 'updated_at' timestamp has not changed for 24 calendar months. This includes cases where no messages have been sent or received, no pipeline stage changes have occurred, and no notes have been added.

3.2 Automated Actions

- A flag entry is written to the GDPR audit log with event type 'auto_deletion_24mo_flag'
- The Agency Owner or Solo Agent receives an email notification listing flagged records
- No personal data is deleted or modified at this stage

3.3 Controller Options

Upon receiving the 24-month notification, the Agency Owner or Solo Agent may:

- Mark the record as active by updating any field (e.g. adding a note)
- Initiate early deletion using the 'Forget Me' function
- Take no action — the record will be automatically anonymised at 36 months

4. The 36-Month Automatic Anonymisation

4.1 Trigger

Records that remain inactive for 36 calendar months and are not in a terminal pipeline stage ('won' or 'lost') are automatically deleted or anonymised by a scheduled database job that runs daily at 02:00 UTC. The action is logged with event type 'auto_deletion_36mo' in the GDPR audit log.

4.2 What Anonymisation Removes

The following personal identifiers are permanently deleted:

- First name and last name (replaced with '[DELETED]')
- Phone number (set to null)
- Email address (set to null)
- Free-text notes (set to null)
- All associated message history
- All property links

4.3 What Is Retained After Anonymisation

The following non-personal data is retained for operational and legal purposes:

- Anonymised pipeline record: pipeline stage, channel, intent, budget range, locations
- Reference number (e.g. RC-2024-00123) — not linked to any personal identifier
- Timestamps: created_at and updated_at
- GDPR audit log entry recording the anonymisation event

4.4 Won and Lost Records

Records in the 'won' or 'lost' pipeline stage are excluded from automatic 36-month deletion or anonymisation, as these records may be required for contractual, legal or tax purposes. The Agency Owner or Solo Agent is responsible for managing the retention of these records in accordance with their own legal obligations.

5. Automated Retention Jobs

Retention enforcement is implemented as scheduled database functions (pg_cron jobs) running within the Azulkey database infrastructure:

Job name	Schedule / Description
realconnect-flag-24mo	Daily at 02:00 UTC — identifies records inactive for 24+ months and writes audit log entries
realconnect-delete-36mo	Daily at 02:00 UTC — deletes or anonymises records inactive for 36+ months (excluding won/lost) and logs event type 'auto_deletion_36mo'

These jobs are monitored for failures. If a job fails to execute, an alert is sent to the Azulkey operations team for manual review within 24 hours.

6. Early Deletion

Agencies and Solo Agents may request or initiate early deletion of any record at any time, regardless of the retention schedule, by:

- Using the 'Forget Me' function within the Azulkey platform
- Submitting a written request to privacy@azulkey.com

Early deletion follows the same process as described in the Data Deletion Policy and is subject to the same audit logging requirements.

7. Backup Retention

Azulkey maintains automated database backups with point-in-time recovery for up to 30 days. Deleted or anonymised data may persist in backups for up to 30 days after deletion. After 30 days, data is permanently removed from all backup systems.

In the event that a data subject requests erasure, Azulkey will take all reasonable steps to ensure that the deletion is reflected in active systems immediately. Removal from backups will occur within the 30-day backup cycle.

8. Audit and Compliance

All retention-related actions — including 24-month flags, 36-month deletions or anonymisations, manual deletions and early erasure requests — are recorded in the GDPR audit log. This log is:

- Append-only: records cannot be modified or deleted
- Retained for 7 years
- Accessible to Agency Owners, Solo Agents and Azulkey super administrators
- Available for export in the event of a regulatory audit

9. Policy Review

This policy is reviewed annually or following any significant change to applicable data protection law, the Azulkey platform architecture, or guidance from the Malta IDPC or European Data Protection Board. The current version is always available at azulkey.com/retention-policy.

10. Contact

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