

Retention Policy — Momtivation App (LeadClosers d.o.o.)

Last updated: [insert date]

1. Purpose of This Policy

This Retention Policy defines how long personal data is stored by Momtivation App (LeadClosers d.o.o.) and when it must be deleted, in compliance with GDPR principles of data minimization and storage limitation.

2. General Principles

- Personal data is kept only for as long as necessary for the purposes for which it was collected.
- Data is securely deleted once it is no longer needed.
- Users may request deletion of their data at any time.
- Backups are deleted within a defined timeframe after operational deletion.

3. Retention Schedule by Data Category

3.1. User Account Data

Includes: name, email, phone number, login credentials

Retention: Until the user deletes their account.

3.2. Health and Fitness Data

Includes: weight, height, goals, health conditions, questionnaire data

Retention: Until account deletion or withdrawal of consent.

3.3. Apple Health / Recording API Data

Includes: steps, distance, calories (read-only)

Retention: Until user revokes permissions.

3.4. Analytics Data

Includes: device information, usage patterns, behavior metrics

Retention: 12–24 months

Tools: Google Analytics, Amplitude, Microsoft Clarity

3.5. System Logs

Includes: IP addresses, technical logs, security events

Retention: 30–90 days

Purpose: security, debugging, fraud prevention

3.6. Marketing and Communication Data

Includes: email subscriptions, WhatsApp communication preferences

Retention: Until user withdraws consent

Tools: HighLevel (SCC protected)

3.7. Community Feed Content

Includes: posts, images, comments

Retention: Visible until user deletes the content or their account.

3.8. Backup Data

Includes: encrypted system backups stored for operational continuity

Retention: Automatically purged within **24–72 hours** after related user data deletion.

4. Restrictions on Retention

Data may be retained longer if required for:

- Compliance with legal obligations
- Resolution of disputes
- Enforcement of agreements

5. Deletion Procedures

5.1. Automated Deletion

- Triggered when a user deletes their account in the app.
- Health data, profile data, preferences, and settings are removed.

5.2. Manual Deletion

- Applied when users make specific GDPR requests.
- Logged internally for compliance purposes.

5.3. Backup Deletion

- Backups automatically expire and are overwritten within 24–72 hours.

6. Documentation and Compliance

All deletion requests and retention-related processing actions are logged for accountability.

7. Review Schedule

This Policy must be reviewed annually or when:

- New features are introduced
- Data categories change

- New processors or partners are added

8. Contact for Questions or Requests

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