



SPAplatform

Data Retention Policy

Introduction & Scope

SPAplatform seeks to ensure that it retains only data necessary to effectively conduct its service activities and work in fulfilment of its mission. The need to retain data varies widely with the type of data and the purpose for which it was collected. SPAplatform strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully deleted when no longer required.

This policy sets forth SPAplatform's guidelines on data retention and is to be consistently applied throughout the SPAplatform organization.

This policy covers all data collected by SPAplatform and stored on SPAplatform owned or leased systems and media, regardless of location. It applies to both data collected and held electronically and data that is collected and held as hard copy or paper files. The need to retain certain information may be mandated by federal or local law, federal regulations and legitimate business purposes.

To make things easier, you'll find summary paragraphs at the top of each section to allow you to navigate this document effectively.

We may need to update this policy from time to time. Where a change is significant, we'll make sure we let you know—usually by an announcement on our newsfeed located on the front page of the SPAplatform software or directly via email..

Who are 'we'?

This privacy policy is enacted by **SPAplatform**, being produced by School Research Evaluation & Measurement Services **SREAMS** (Orchard Downs Pty. Ltd.). When we say **SPAplatform**, **we**, **our**, or **us**, we're talking about our organisation.

Our Service may refer to the **SPAplatform** Service or auxiliary services SREAMS provide such as Professional Development and research services.

Website: <https://www.spaplatform.com.au>

Our services

Our **services** consist of all the services we provide now or in the future, including our online data analysis products and Professional Development.

You, Your school, and your students

When we say **you** or **your**, we mean both you and any school, office, or department you're authorised to represent. When we say **students**, we mean one or more students whom you have chosen to enter data for within our **SPAplatform** services.

Reasons for Data Retention

SPAplatform retains only the data that is necessary to effectively conduct its service activities, fulfill its mission and comply with applicable laws and regulations.

Reasons for data retention may include:

- Providing an ongoing service to our clients.
- Compliance with applicable laws and regulations associated with financial and programmatic reporting by SPAplatform.
- Security incident or other investigation
- Intellectual property preservation
- Litigation

Data Duplication

SPAplatform seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or other service reasons it is necessary for data to be held in more than one place. This policy applies to all data in SPAplatform's possession, including duplicate copies of data.

Data Retention Requirements

SPAplatform has set the following guidelines for retaining all client data as defined in the SPAplatform's data [privacy policy](#).

- Website visitor data will be retained as long as necessary to provide the service requested/initiated through the SPAplatform website.
- Event data (Personal Development session, Training and Seminars) will be retained for the period of the event, including any follow up activities, such as the distribution of reports, plus a maximum of 12 months.
- Clients account data will be retained as long as necessary to provide the service requested/initiated through the SPAplatform. This includes any personal data, results data, billing information, email addresses and images stored for the purposes of providing our services.

Cancellation of Subscription

In the case of an account being suspended for NON-PAYMENT:

Client data will be held for a maximum of 12 months. After which all data will be removed. Excluding only necessary information for business operations.

In the case of an account being suspended BY-REQUEST:

Client data will be held for a maximum of 12 months. After which all data will be removed. Excluding only necessary information for business operations.

In the case of an account being CANCELLED:

Client data will be removed within 30 days of the end of the billing period. When requested by an authorized subscriber.

Excluding only necessary information for business operations.

Any cancellation requested before the above date will not receive a refund for the remainder of the billing period.

Data Destruction

Data destruction ensures that SPAplatform manages the data it controls and processes it in an efficient and responsible manner. When the retention period for the data as outlined above expires, SPAplatform will actively destroy the data covered by this policy. If an individual believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, they should identify this data and provide information as to why the data should not be destroyed. Any exceptions to this data retention policy must be approved by SPAplatform's data protection officer in consultation with legal counsel. In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.