

Data Retention Policy

Simulcation — Datacenter Simulation Platform

Version 1.0 · Last updated: 9 June 2026 · Owner: Duncan Pond · Review: annually

1. Purpose and Scope

This policy sets out how long Simulcation retains personal and operational data, and how that data is deleted or anonymised when it is no longer needed. It implements the retention commitments published in our Privacy Notice and the obligations in our Data Processing Agreement. It applies to all personal data processed through the Service, across production systems, logs and backups, and to data held by our sub-processors on our behalf.

2. Principles

We keep personal data only for as long as necessary for the purpose for which it was collected, or as required by law. We minimise what we collect, delete or anonymise data once its retention period ends, and apply the same standards to backups and to sub-processors.

3. Roles and Responsibilities

The data protection lead owns this policy and the retention schedule, approves any exceptions, and reviews the policy at least annually. Engineering is responsible for implementing automated deletion and backup-purge routines, and for honouring legal holds. Support and operations follow the schedule for the records they handle.

4. Retention Schedule

Unless a legal hold applies (Section 7), the following periods apply. "Starts from" indicates when the retention clock begins.

Data category	Retention period	Starts from	Deletion method
Account and profile data	Life of the Account, then within 90 days	Account closure	Deletion or anonymisation
Simulation and usage content (projects, configurations, BOMs)	Life of the Account, then within 90 days (unless exported or legally required)	Account closure	Permanent deletion
Billing and transaction records	10 years (Swiss bookkeeping law, Art. 958f CO)	End of the financial year of the transaction	Permanent deletion
Technical and log data	Up to 12 months	Log creation	Deletion or aggregation
Support communications	Up to 24 months	Resolution of the request	Permanent deletion
Marketing consent records	Until withdrawal, plus up to 3 years	Withdrawal / unsubscribe	Permanent deletion
Cookies and similar identifiers	Session to up to 12 months (per cookie)	When set	Expiry
Backups	Rolling; fully purged within 90 days	Backup creation	Rolling overwrite

5. Deletion and Anonymisation

When a retention period ends, data is either permanently deleted or irreversibly anonymised so that it can no longer be linked to an individual. Anonymised or aggregated data (for example usage statistics) may be retained for analytics without further restriction. Deletion routines are automated where practicable and run on a regular schedule.

6. Backups

Personal data deleted from production may persist briefly in encrypted backups. Backups are overwritten on a rolling basis and fully purged within 90 days, after which deleted data is no longer recoverable. We do not restore individual records from backups to circumvent a deletion request.

7. Legal Holds

Where data is required to establish, exercise or defend legal claims, to comply with a legal obligation, or in connection with an investigation, the data protection lead may place a legal hold that suspends deletion for the relevant data. The hold is documented, limited to what is necessary, and lifted as soon as it is no longer required, after which the normal schedule resumes.

8. Sub-processors and Student Data

Our sub-processors are contractually required to delete or return personal data in line with this policy and our agreements with them. For data processed on behalf of an educational institution, retention and deletion follow the Data Processing Agreement: such data is deleted or returned on termination or on the institution's written request, with backups purged within 90 days.

9. Minors' Data

Data relating to users who are minors is treated with particular care: we collect only what is needed for the educational purpose, do not retain it for marketing or profiling, and prioritise its deletion at the end of the applicable period or on request from the institution, parent or guardian.

10. Review and Governance

This policy and the retention schedule are reviewed at least annually, and whenever there is a material change to the Service, our sub-processors, or applicable law. Changes are versioned, and any change affecting the public-facing commitments is reflected in the Privacy Notice.

11. Related Documents

- Privacy Notice (public retention commitments)
- Educational Use Agreement and Data Processing Agreement
- Terms of Use
- Sub-processors list

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