

# Data Retention Policy

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## 2 Sureños - Data Lifecycle Management

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**Policy Owner:** Management

**Contact:** info@2surenos.pro

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### 1. Policy Statement

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2 Sureños is committed to responsible data management and GDPR compliance. This Data Retention Policy establishes clear guidelines for how long personal data is retained, when it is deleted or anonymized, and the procedures for secure disposal.

**Core Principles:**

- **Data Minimization:** Retain only necessary data
  - **Storage Limitation:** Keep data no longer than required
  - **Purpose Limitation:** Retain data only for specified purposes
  - **Security:** Protect data throughout its lifecycle
  - **Accountability:** Document and audit retention practices
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### 2. Scope and Applicability

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#### 2.1 Scope

This policy applies to:

- All personal data collected through <https://2surenos.pro>
- Contact form submissions
- Email communications
- Cookie data
- System logs and technical data
- Business records containing personal data

#### 2.2 Applicable Regulations

- **GDPR** (EU Regulation 2016/679)
  - **LOPD-GDD** (Spanish Organic Law 3/2018)
  - **Spanish Commercial Code** (record retention requirements)
  - **Spanish Tax Law** (invoice retention requirements)
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### 3. Data Retention Schedules

#### 3.1 Contact Form Submissions

| Data Category      | Retention Period                 | Rationale                        | Disposal Method               |
|--------------------|----------------------------------|----------------------------------|-------------------------------|
| Active Inquiries   | Until resolved + 30 days         | Customer service continuity      | Secure deletion               |
| Accepted Projects  | 6 years after project completion | Legal obligation (tax/invoicing) | Secure deletion after 6 years |
| Declined Inquiries | 90 days                          | Legitimate interest (follow-up)  | Anonymization after 90 days   |
| Spam/Invalid       | 7 days                           | Fraud prevention                 | Immediate secure deletion     |

#### Detailed Workflow

##### Stage 1: Active Inquiry (0-30 days)

- Full data retention
- Customer service team has access
- Regular follow-up permitted

##### Stage 2: Project Accepted

- Converted to customer record
- Retention extends to 6 years from project completion
- Subject to invoicing and tax record requirements

##### Stage 3: Inquiry Declined/No Response

- After 30 days: Flag for anonymization
- After 90 days: Execute anonymization
- Name → "Anonymized Contact #[ID]"
- Email → "[anonymized]@example.com"
- Phone → "0000000000"
- Postal Code → "000000"
- Message → "[Content removed]"
- Retain: Service type (for statistics), timestamp

##### Stage 4: Spam/Fraudulent

- Immediate deletion within 7 days
- IP address blocked for 90 days (fraud prevention)

### 3.2 Email Communications

| Email Type                   | Retention Period                 | Legal Basis          | Disposal Method               |
|------------------------------|----------------------------------|----------------------|-------------------------------|
| <b>Service Confirmations</b> | Until inquiry resolved + 30 days | Contract performance | Secure deletion               |
| <b>Quote Communications</b>  | 6 months                         | Legitimate interest  | Secure deletion               |
| <b>Contractual Emails</b>    | 6 years                          | Legal obligation     | Secure deletion after 6 years |
| <b>General Inquiries</b>     | 90 days                          | Legitimate interest  | Secure deletion               |

### 3.3 Website Cookies and Preferences

| Data Type                 | Retention Period     | Renewal               | Disposal Method    |
|---------------------------|----------------------|-----------------------|--------------------|
| <b>cookieConsent</b>      | 1 year               | User must re-consent  | Browser expiration |
| <b>preferred-language</b> | 1 year               | Auto-reset to default | Browser expiration |
| <b>Session cookies</b>    | Until browser closes | N/A                   | Automatic deletion |

### 3.4 System Logs and Technical Data

| Log Type                | Retention Period          | Purpose                         | Disposal Method      |
|-------------------------|---------------------------|---------------------------------|----------------------|
| <b>Application logs</b> | 90 days                   | Debugging, security monitoring  | Automated deletion   |
| <b>Security logs</b>    | 1 year                    | Incident investigation          | Automated deletion   |
| <b>Backup logs</b>      | 30 days                   | Disaster recovery               | Automated deletion   |
| <b>IP addresses</b>     | 7 days (anonymized after) | Rate limiting, fraud prevention | Anonymization script |

### 3.5 Legal and Financial Records

| Record Type     | Retention Period                | Legal Requirement             | Disposal Method |
|-----------------|---------------------------------|-------------------------------|-----------------|
| Invoices        | 6 years                         | Spanish tax law (Art. 30 LGT) | Secure deletion |
| Contracts       | 6 years after expiration        | Spanish Commercial Code       | Secure deletion |
| Tax records     | 6 years                         | Spanish tax law               | Secure deletion |
| Consent records | Duration of processing + 1 year | GDPR accountability           | Secure deletion |

## 4. Data Lifecycle Management

### 4.1 Collection Phase

- Collect only necessary data (minimization principle)
- Inform users about retention periods in privacy policy
- Obtain clear consent where required
- Document legal basis for processing

### 4.2 Active Use Phase

- Data accessible to authorized personnel only
- Regular access audits
- Encryption at rest and in transit
- Backup procedures implemented

### 4.3 Review Phase

#### Quarterly Review Process:

1. Identify data reaching retention deadline
2. Verify no legal holds or pending requests
3. Prepare anonymization/deletion list
4. Execute approved deletions
5. Document actions taken

### 4.4 Disposal Phase

#### Deletion Methods

- **Database Records:** Permanent deletion with overwrite (no soft deletes for expired data)
- **Backups:** Aged out according to backup retention schedule (30 days)
- **Logs:** Automated purge scripts
- **Email Archives:** Secure deletion from mail servers

#### Anonymization Methods

- **Reversible Pseudonymization:** Not used for expired data

- **Irreversible Anonymization:** Used for declined inquiries
- Replace identifying fields with generic values
- Retain statistical/analytical value only
- No possibility of re-identification

## 4.5 Documentation

- All disposal actions logged with:
  - Date and time
  - Data category
  - Number of records
  - Method used (deletion/anonymization)
  - Authorized person
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## 5. Exceptions and Legal Holds

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### 5.1 Legal Hold Procedures

Data retention may be extended if:

- **Litigation Hold:** Active or pending legal proceedings
- **Regulatory Investigation:** Request from data protection authority
- **Criminal Investigation:** Request from law enforcement
- **Audit Requirements:** External audit in progress

**Process:**

1. Legal department/management issues hold notice
2. IT department flags affected records
3. Automated deletion suspended
4. Hold documented with reason and date
5. Regular review of hold status (monthly)
6. Release hold when no longer required

### 5.2 Data Subject Rights Requests

- **Right to Erasure:** May override retention periods (unless legal obligation applies)
  - **Verification:** Confirm identity before processing erasure requests
  - **Response Time:** 30 days maximum
  - **Documentation:** Log all requests and actions taken
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## 6. Implementation and Automation

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### 6.1 Automated Processes

#### Database Cleanup Scripts

```
-- Example: Weekly anonymization of declined inquiries older than 90 days
UPDATE contact_submissions
SET
  name = 'Anonymized Contact #' || id,
  email = '[anonymized]@example.com',
  phone = '0000000000',
  postalCode = '00000',
  message = '[Content removed for privacy]',
  status = 'anonymized'
WHERE
  status = 'declined'
  AND created_at < NOW() - INTERVAL '90 days'
  AND status != 'anonymized';
```

#### Automated Tasks (Scheduled)

- **Daily:** Delete spam submissions older than 7 days
- **Weekly:** Anonymize declined inquiries older than 90 days
- **Monthly:** Review records approaching retention deadline
- **Quarterly:** Comprehensive data audit and cleanup

### 6.2 Manual Review Points

- Customer records linked to completed projects (verify 6-year period)
  - Records under legal hold (monthly status check)
  - High-value customer data (management approval for deletion)
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## 7. Roles and Responsibilities

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### 7.1 Management

- Approve data retention policy
- Authorize exceptions and legal holds
- Allocate resources for compliance
- Annual policy review

### 7.2 IT Department

- Implement automated deletion/anonymization scripts
- Maintain secure backup systems
- Execute approved data disposal
- Monitor system logs

### 7.3 Customer Service Team

- Update inquiry status in database
- Flag completed/declined inquiries
- Report data quality issues

- Follow data handling procedures

## 7.4 All Staff

- Follow data retention guidelines
  - Report policy violations
  - Attend training sessions
  - Maintain confidentiality
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# 8. Monitoring and Compliance

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## 8.1 Key Performance Indicators (KPIs)

- **Deletion Rate:** % of records deleted/anonymized on schedule
- **Manual Review Time:** Average time to process data subject requests
- **Storage Efficiency:** % reduction in stored personal data over time
- **Compliance Rate:** % of data categories meeting retention schedules

## 8.2 Audit Schedule

- **Quarterly:** Internal review of retention schedules
- **Annually:** Comprehensive audit by management
- **Ad-hoc:** Following data breaches or policy violations

## 8.3 Reporting

- Quarterly report to management on:
  - Records deleted/anonymized
  - Data subject rights requests processed
  - Policy exceptions and legal holds
  - Compliance issues identified
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# 9. Training and Awareness

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## 9.1 Required Training

- **New Employees:** Data retention policy overview (within first week)
- **Annual Refresher:** All staff (mandatory)
- **Role-Specific:** IT, customer service (biannual)

## 9.2 Training Content

- GDPR storage limitation principle
  - Retention schedules for relevant data types
  - Deletion and anonymization procedures
  - Legal hold procedures
  - Data subject rights and retention
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## 10. Policy Review and Updates

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### 10.1 Review Schedule

- **Regular Review:** Annually (every November)
- **Triggered Review:** When:
  - Legal or regulatory changes occur
  - New data processing activities introduced
  - Data breach or compliance incident
  - Supervisory authority guidance issued

### 10.2 Update Process

1. Review current retention schedules
2. Assess legal and business requirements
3. Consult with legal advisors if needed
4. Draft policy updates
5. Management approval
6. Communicate changes to all staff
7. Update training materials
8. Implement technical changes

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## 11. Related Policies and Documents

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- **GDPR Records of Processing Activities** (GDPR\_RECORDS\_OF\_PROCESSING\_ACTIVITIES.md)
- **Privacy Policy** (<https://2surenos.pro/politica-privacidad>)
- **Cookie Policy** (<https://2surenos.pro/politica-cookies>)
- **Legal Notice** (<https://2surenos.pro/aviso-legal>)
- **Information Security Policy** (internal document)
- **Data Breach Response Plan** (internal document)

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## 12. Contact Information

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### Questions about data retention:

Email: [info@2surenos.pro](mailto:info@2surenos.pro)

Phone: +34 711 509 180

### Data subject rights requests:

Email: [info@2surenos.pro](mailto:info@2surenos.pro)

Response time: Within 30 days

### Supervisory Authority:

Agencia Española de Protección de Datos (AEPD)

Website: <https://www.aepd.es>

Phone: +34 901 100 099

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## 13. Appendices

### Appendix A: Retention Period Quick Reference

| Data Type        | Keep For                 | Then              |
|------------------|--------------------------|-------------------|
| Active inquiry   | 30 days after resolution | Delete or convert |
| Declined inquiry | 90 days                  | Anonymize         |
| Customer project | 6 years                  | Secure delete     |
| Cookie consent   | 1 year                   | Expire            |
| System logs      | 90 days                  | Auto-delete       |
| Security logs    | 1 year                   | Auto-delete       |
| Invoices         | 6 years                  | Secure delete     |

### Appendix B: Anonymization Checklist

Before anonymizing contact form data, verify:

- ☐ Inquiry status is “declined” or “no response”
- ☐ 90+ days have passed since last contact
- ☐ No legal hold applies
- ☐ No pending data subject rights request
- ☐ No linked customer/project records

Then replace:

- ☐ Name with “Anonymized Contact #[ID]”
- ☐ Email with “[anonymized]@example.com”
- ☐ Phone with “000000000”
- ☐ Postal code with “00000”
- ☐ Message content with “[Content removed]”

Retain for statistics:

- ☒ Service type
- ☒ Submission timestamp
- ☒ Language preference
- ☒ Anonymized status flag

### Appendix C: Legal Basis for 6-Year Retention

#### Spanish Tax Law (Ley General Tributaria):

- Article 30: 6-year retention for tax records
- Applies to invoices, contracts, and related documents

#### Spanish Commercial Code (Código de Comercio):

- Article 30: 6-year retention for accounting records

#### Statute of Limitations:

- Civil claims: Generally 5 years

- Tax audits: 6 years
- Prudent retention: 6 years for business records

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## Document Approval

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**Approved by:** Management, 2 Sureños  
**Date:** November 9, 2025  
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**Signature:** \_\_\_\_\_  
**Title:** Managing Director

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**Document End**