

Data retention and disposal policy

Version	1.0
Effective date	27 October 2026
Owner	Robin Ashford
Applies to	All data Final Frame holds, in every environment and backup
Review	27 October 2027
MPA CSBP	OP-3.2, OR-1.4, TS-1.16, TS-3.2

Approved by Robin Ashford, Founder, 27 October 2026

Retention schedule

Data	Kept for	Deleted by
Customer content in an Org bucket	Until the customer deletes it, or the Org ends. A deleted object stays in soft delete 30 more days	The customer, or Org closure below
Film reading copies in the scratch bucket	1 day	Bucket lifecycle rule
Incomplete multipart uploads	7 days at most	Bucket lifecycle rule on Org buckets
Project inbox email and attachments	Life of the project	Project or Org deletion
Org records in Postgres	Life of the Org	Org closure
Audit trail	Life of the Org. Exported as JSON Lines before closure	The last step of Close permanently
Sessions	12 hours after creation; rows kept 90 days after expiry	Expired rows refused at once. The daily purge removes rows whose expiry passed more than 90 days ago. Impersonated sessions and the sessions they return to are kept as evidence
Launch tokens (impersonation)	Kept as evidence	Never by the app
Password reset and invitation tokens	Until used or expired, then 90 days	The daily purge
Application logs	30 days in _Default	Log bucket retention
Cloud audit logs	400 days	Google, _Required bucket
Database backups	30 daily backups, 7 days of point-in-time logs	Cloud SQL
Container images	The last 50 release tags, and every image that served customers in the past 400 days	Artifact Registry cleanup

Data	Kept for	Deleted by
Users' personal data	While they hold a membership, then 90 days. A user is anonymised, so the audit trail and launch tokens are kept	The retention purge
Screening guests: address, name, company, expiry, NDA acceptance, revocation	Life of the Org. A guest's erasure request is met by anonymising or deleting that guest's records	Org closure, or an erasure request
Screening Room viewing records: guests' sign-ins, sign-outs and NDA acceptances; members' and guests' title views, plays with their progress and search results opened; each with IP address and user agent	Life of the Org	Org closure, or an erasure request for that guest
Screening guests' viewer sessions, magic links and streams	Life of the Org. Token hashes only	Org closure
Screening guests' second factors	Life of the Org. A removed factor's key material is cleared when it is removed	Org closure
Screening Room recent searches	Ten a viewer	The oldest dropped past ten; the viewer clears one or all
Screening Room theme passes	Life of the Org. Counts, model, cost and who asked; no title	Org closure
Audit rows about guests	Life of the Org	Org closure

Screening Room records

Guest rows are revoked, never deleted, by the app. The viewing records are append only: the app role holds SELECT and INSERT, and no policy allows an UPDATE or a DELETE. Every Screening Room table cascades from orgs, so Close permanently deletes them with the Org's other rows. The retention purge covers app sessions, password resets and invitations.

Ending an Org

When a customer leaves, or asks for erasure:

1. Offer an export of their content (bucket copy) and their audit trail. Deliver it by signed URL. Record the export.
2. Archive the Org (Platform > Organisations > the Org > Ending > Archive). Nobody can sign in to it. Nothing is deleted, and this can be undone.
3. 30 days after archiving, close it permanently (Ending > Close permanently). It is refused before the 30 days, to anyone but a platform admin, and for Final Frame's own Org. The database checks the same rules again.
4. Database backups that hold the Org's rows age out within the backup retention (30 daily backups).

Certificate of destruction

Issued for every closure when the last step is done: the Org's name, slug and id; when it was archived; who approved and when; the audit export (count and SHA-256) or its decline; the landing keys deleted; each

bucket's object count and bytes and its soft delete before; the identities deleted; the key versions and the date each is destroyed; the queued work stopped; when the records were deleted; the manifest's SHA-256; and a line for Robin's signature. One A4 page, saved as PDF from the browser. The approver is emailed a link to it. The manifest downloads beside it, and its SHA-256 is the digest on the certificate.

Deleting a single asset

Deleting an asset removes its object and its proxies from the Org bucket. Soft delete keeps a recoverable copy for 30 days, then Google deletes it. The removal is in the audit trail.

Copies outside the Org bucket

- Model providers: see the AI use policy for what each keeps.
- fal.ai returns a generated image on a fal-hosted URL. Final Frame reads it into the Org bucket. The copy at fal is subject to fal's retention.
- Workstations: deleted at the end of the task (see the Workstation security policy).

Media and devices

Final Frame owns no storage hardware. Google destroys its disks under its own certified process. A Mac that leaves service is erased with "Erase All Content and Settings", which destroys the FileVault key.

Legal hold

If a dispute or investigation needs data kept, Robin suspends deletion for that Org in writing and records the hold and its release.