# Data Retention and Destruction Policy

As an open and transparent technology partner for thousands of organizations involved in learning, it's important that Schoology's customers understand how their data is managed. This policy defines how that data is backed up and eventually destroyed.

# **Data Retention**

While Schoology maintains an infrastructure designed for high availability and fault tolerance, we believe that a conservative data backup strategy is important given the value and sensitivity of our customers' data. Therefore, we have implemented a robust data and content backup strategy.

#### **Databases**

Schoology replicates databases within our production datacenter so that the loss of any one server will not impact Schoology's ability to serve our customers. Additionally, Schoology's databases are replicated in near real time to a set of servers located in a datacenter in a secondary geographic region, so that in a worst-case scenario where the live region becomes unavailable, no more than a few seconds of data are lost.

In addition to live data replication, Schoology creates backups of all datastores on a daily basis. These backup files are encrypted and then retained on the following schedule:

- Daily: 30 days
- Weekly: 6 months
- Monthly: 1 year

Destruction of these backups involves deletion of the encrypted backup files. Since they are not stored on removable media and are left encrypted when they are deleted, there's no removable media involved that needs to be tracked, destroyed and verified. Database backups are restored and verified on a weekly basis.

## **Uploaded Content**

Content that is uploaded to Schoology is stored on an infrastructure that is designed to be 99.99999999% durable over the course of a year. Like the database information, we replicate this data to a datacenter in a secondary geographic region with the same durability within minutes of the content being uploaded.

## **Data Destruction**

Delete actions in Schoology almost always result in "soft" deletes, which is to say that the system marks the data item as deleted and will not show it in any normal views. However, the item is still recoverable. This allows our users to recover from unintentional errors without the need to restore selective data from a backup, which can be a time consuming and expensive process. Examples of soft deletes include deletion of courses, which may be retrieved from the course admin's "recycling bin" in Schoology. Additionally, accidental un-enrollment of a student from a course appears to delete their grades, however upon restoration of the enrollment, their grade data will be restored as well.

In the case that a customer has a need to permanently remove a piece of data that was mistakenly entered into Schoology, they can engage with Schoology's support organization to permanently obfuscate that data item from the live system and all future backups.

### **End of Contract Data Disposition**

At the end of a customer's usage of the Schoology platform, the customer may request that Schoology make their data unavailable. At this point Schoology will disable access to the customer's data by configuring the software to disallow access. If a customer has other specific requirements, Schoology will engage with the customer to define a Statement of Work and, if applicable, any associated fees.

