Cognivio Data Retention Policy

Cognivio Ltd. (in formation) · Version 1.0 · Effective date: 6 October 2026

1. Purpose and scope

This Policy states, for each category of data the Cognivio Service processes, why it is collected, the business need for keeping it, how long it is kept, and how it is deleted. It is written to satisfy the written-retention-policy requirements of the amended US COPPA Rule (16 CFR 312.10), Israel's Privacy Protection (Data Security) Regulations, GDPR and UK GDPR Articles 5(1)(e) and 30, and the Israeli Ministry of Education supplier standard, and to be readable by a school administrator. It forms part of the commitments in Cognivio's Privacy Policy and Data Processing Addendum (DPA).

Governing principle: we keep personal data only as long as it is reasonably needed for the specific purpose it was collected for, and then we delete it. Indefinite retention of personal data is not permitted under this Policy. The only data retained indefinitely is Non-Identifiable Data, which is not personal data.

2. Definitions

"School year" means the Customer's academic year as configured in the Service for the Customer's organisation (default: 1 September to 31 August). "Retention election" means an affirmative in-product choice by both the teacher who recorded a lesson and an authorised Customer administrator to retain a specific recording beyond the default period. "Rendered recording" means the blurred version of a lesson produced by the privacy pipeline. "Analysis artefacts" means the AI analysis of instructional practice, teacher feedback and coaching content derived from a lesson. "Held recording" means a recording that the automated pipeline could not clear and that is therefore not released.

3. Retention schedule

Data category	Purpose and business need	Retention	Deletion method
Raw (unblurred) upload	Input to the privacy pipeline only	Deleted automatically once the rendered recording is verified. If the recording is held, the raw upload is kept only for the 30-day hold period.*	Object deleted from storage; no copy retained
Held recording	A recording the automated pipeline could not clear is held and never released. Cognivio staff view a held recording only where needed to troubleshoot a specific problem.	30 days from the hold, then destroyed (raw, processed and any test renders), unless it is released after the problem is fixed or the teacher deletes it earlier.*	Objects deleted; a record of the outcome is kept without content
Rendered recording	Teacher reflection and coaching; lessons the teacher chooses to share	End of the school year in which it was recorded plus 60 days, unless a retention election is made. The teacher may delete it at any time.	Deleted from all collections and object storage
Transcript	Coaching and analysis; would contain student speech	Not currently produced (transcription is disabled). If enabled: same as the rendered recording it belongs to.	Deleted with the recording
Face-detection results on the processing record	Privacy render and quality checks; coordinates and match flags only, no imagery	Same as the rendered recording	Deleted with the recording
Recording under a retention election	Exemplary lesson, portfolio or continuing coaching	Until the election is withdrawn by either party, the teacher deletes it, or the teacher's account closes. The election is re-confirmed each school year and lapses if not re-confirmed within 60 days of year-end.	As for rendered recordings
Analysis artefacts and teacher feedback	The teacher's own professional-development record over time	Life of the teacher's active account. The teacher may delete items individually. Deleted 30 days after account closure.	Deleted with the account or individually

Data category	Purpose and business need	Retention	Deletion method
Mira coaching conversations (teacher-private)	The teacher's coaching relationship	Life of the teacher's active account; deleted 30 days after account closure. A teacher may ask us to delete any conversation at any time.	Deleted
Organisation-visible trends and dashboards	School professional-growth views	Recomputed on each request from the stored analysis, so a lesson no longer contributes once its analysis is deleted. Two dashboard views keep a temporary cached copy of the computed view so they load faster; each copy expires automatically after a short, fixed period, and is deleted with the rest of the data when a teacher's or school's data is erased.	Derived; cached copies expire or are deleted on erasure
Teacher reference photos	Recognising the consenting teacher in the privacy pipeline	Until the teacher withdraws consent or the account closes, then deleted within 30 days. No face template is created.	Deleted from object storage (encrypted at rest)
Non-Identifiable Data	Service improvement, model development, research	Indefinite; not personal data	Not applicable
Account data (name, email, role, credentials)	Operating the account	Until account closure plus 30 days; records of unaccepted invitations, 90 days	Deleted
Privacy, deletion and administrative audit records	Evidence that privacy rules were applied; regulatory requirement	24 months (Israel Data Security Regulations audit-record requirement). They contain event metadata, not content.*	Purged on schedule
Application and platform logs	Operations and security	Kept by our hosting provider (Railway) for its standard log-retention period; not archived by Cognivio	Expire at the provider
Pipeline job records and AI-usage ledger	Operations, cost control, safety history	12 months; they contain no recording content	Purged on schedule
Database backups	Disaster recovery	7-day rolling retention, in-region; deleted data leaves backups within 7 days	Automatic expiry
Support and billing correspondence	Customer relationship; legal obligations	Billing records: term of the Agreement plus 7 years, as tax law requires. Support correspondence: 24 months.	Deleted
Data at AI sub-processors	Inference only	Google (Gemini API, paid): does not use our data to improve its products. Cognivio deletes each uploaded file by API call when its request completes; a file not deleted that way expires on Google's side after about 48 hours. Google keeps prompts and outputs for 55 days solely to detect abuse. Anthropic (Claude): uses our data only to provide its service and not to train its models, as set out in its DPA.	Provider deletion

* Automated expiry for the categories marked with an asterisk is being built. Until it is live, Cognivio applies the stated period through a scheduled manual purge carried out at least monthly.

4. Retention election

The default is deletion after the school year. A recording is kept beyond that only if both the teacher and an authorised administrator elect to keep it. Either may withdraw the election, and the teacher may delete the recording regardless of the election. Elections are re-confirmed each year; an election that is not re-confirmed lapses and the recording is deleted. The Service notifies the teacher and the administrator 30 days before a scheduled deletion.

5. Deletion on request

- **Teacher:** may delete any recording (and its transcript and analysis) in-product at any time, and may ask for her account to be closed. Account closure deletes all Teacher Data within 30 days.
- **Customer:** may instruct deletion of any Customer Data, including all data of a departing teacher or of the whole organisation. Cognivio deletes it and confirms in writing within 30 days.
- **Parent or student (through the school):** the school may instruct deletion of any recording in which a student appears. Cognivio deletes it within 10 business days and confirms.
- **Regulator (Israeli Ministry of Education):** full deletion on demand, including data held by AI providers and backups (by expiry), with evidence of deletion provided.

6. Deletion standards

Deletion means removal from all production data stores and object storage so that Cognivio cannot restore the data, with backups expiring on the rotation schedule. Deletion events are recorded in the audit records with the object identifier, actor, time and scope, and without content. Cognivio does not keep “soft-deleted” copies of recordings.

7. Retention outside the default

7.1 Legal requirements. Cognivio may keep specific data beyond the periods above only where the law requires it, to comply with a litigation hold, or to resolve a security incident, and only for as long as that need exists. Customers are told of any such hold affecting their data.

7.2 Customer-specific periods. Where a Customer’s legal or security requirements call for a different period for a category of its data (for example, a longer period for audit records or security logs), the period agreed in writing with that Customer applies to that Customer’s data. An agreed period never overrides a teacher’s right to delete her own recordings and analysis, or the retention-election rule for recordings in section 4.

8. Review

This Policy is reviewed every year and whenever a new data category is introduced. Changes that shorten retention take effect immediately; changes that lengthen retention of personal data require notice to Customers.

9. COPPA conformity note

For US Customers, the amended COPPA Rule requires an operator to keep children’s personal information only as long as reasonably necessary for the specific documented purpose for which it was collected, and to maintain and publish a written retention policy stating the purpose, the business need and the deletion timeline. Student information exists in the Service only within rendered recordings (and transcripts, if ever enabled). This Policy fixes their retention at the school year of collection, plus the 60-day notice period, unless a documented retention election exists, and provides for deletion on the school’s instruction at any time. Student information is not used for any secondary purpose.

Questions: privacy@cognivio.live