

OPULUME DATA RETENTION & DELETION POLICY

EffectiveDate: June 30, 2026

Last Updated: June 30, 2026

1. Purpose

Opulume Limited ("Opulume", "we", "our", or "us") is committed to retaining personal information only for as long as necessary to provide our services, comply with legal obligations, resolve disputes, protect the security of our platform and fulfil the purposes described in our Privacy Policy.

This Data Retention & Deletion Policy explains:

- what information we retain;
- how long information is retained;
- when information is permanently deleted;
- how users may request deletion of their personal information.

This Policy should be read together with our Privacy Policy and Terms and Conditions.

2. Our Retention Principles

We apply the following principles when processing personal information:

- collect only information necessary for providing the Service;
 - retain information only for as long as necessary;
 - securely delete information when no longer required;
 - minimise storage of special category health information;
 - apply automated deletion where appropriate;
 - comply with applicable legal and regulatory obligations.
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3. Categories of Information

The Service processes the following categories of information:

- account information;
- authentication information;
- wellness information;
- AI-generated outputs;
- skin image analysis;
- security logs;
- operational logs;
- customer support communications;
- legal compliance records.

Each category has its own retention period.

4. Retention Schedule

Account Information

Examples:

- name;
- email address;
- account preferences;
- profile information.

Retention

Retained while your account remains active.

Deleted following verified account deletion requests unless retention is required by law.

Authentication Information

Examples:

- encrypted passwords;
- authentication tokens;
- session identifiers;
- login history.

Retention

Passwords remain stored only in encrypted hashed form while your account exists.

Authentication tokens expire automatically.

Compromised sessions may be invalidated immediately.

Wellness Information

Examples:

- symptom journals;
- mood tracking;
- sleep tracking;
- hydration;
- nutrition;

- wellbeing information;
- body map entries;
- skin profile information.

Retention

Retained while your account remains active.

Deleted following verified deletion requests unless legal obligations require otherwise.

Skin Image Analysis

Skin photographs submitted for AI analysis are subject to a strict minimisation policy.

Photographs are:

- processed only in volatile memory;
- never written to permanent storage;
- never written to application databases;
- never stored within file storage systems;
- never retained after processing.

Retention

Immediately deleted following completion of AI processing.

No image archive is maintained.

AI Analysis Cache

Temporary AI processing results may be held briefly to improve application responsiveness.

Retention

Automatically expires after approximately **one hour**.

Deleted automatically without user intervention.

Wellness Reports

Generated wellness reports are retained for user access.

Retention

Automatically deleted after **30 days** unless regenerated by the user.

Operational Logs

Examples:

- request logs;
- application diagnostics;
- performance metrics.

Retention

Retained for operational monitoring.

Anonymised after **12 months**.

Security Logs

Examples:

- authentication events;
- failed login attempts;
- rate-limiting events;
- account security events.

Retention

Retained only for security monitoring, fraud prevention and incident investigation.

Retention periods may vary according to security requirements and legal obligations.

Customer Support Records

Support communications maybe retained to resolve enquiries and improve customer service.

Retention periods depend upon the nature of the enquiry and applicable legal obligations.

5. Automatic Deletion

The Service incorporates automated deletion processes including:

- immediate deletion of skin photographs;
- automatic expiry of AI cache;
- automatic deletion of wellness reports after 30 days;
- scheduled anonymisation of operational logs.

Automated deletion reduces unnecessary retention of personal information.

6. User-Initiated Deletion

Users may request deletion of their account and associated personal information at any time.

Where technically feasible and legally permissible, deletion requests will result in removal of:

- account information;
- wellness journals;
- symptom records;
- lifestyle information;
- wellbeing information;
- AI-generated reports;
- associated personal information.

Certain records may be retained where required to:

- comply with legal obligations;
- resolve disputes;
- protect platform security;
- establish or defend legal claims.

7. Withdrawal of Consent

Users may withdraw consent for processing of special category health information at any time.

Withdrawal of consent may affect the availability of certain features.

Withdrawal does not affect processing carried out lawfully before consent was withdrawn.

8. Secure Deletion

Where information is deleted, Opulume seeks to ensure deletion is carried out securely using appropriate technical and organisational measures.

Deletion may include:

- permanent database deletion;
- cryptographic destruction where appropriate;
- scheduled overwrite processes;
- secure removal from active systems.

Residual copies may remain temporarily within encrypted disaster recovery systems until backup rotation completes.

9. Backup Systems

Primary database backups are maintained in accordance with operational requirements.

Backups are:

- encrypted;
- securely stored;
- retained only as long as operationally necessary.

Deleted information may remain within encrypted backup media until scheduled backup rotation occurs.

Deleted information is not restored into active production systems except where required for disaster recovery.

10. Legal Retention Requirements

Certain information maybe retained beyond normal retention periods where required to:

- comply with applicable law;
- satisfy regulatory obligations;
- investigate fraud;
- protect users;
- defend legal claims.

Such retention will be limited to the minimum information necessary.

11. Data Minimisation

Opulume follows the principle of data minimisation by:

- collecting only information required for the Service;
 - avoiding unnecessary retention of images;
 - limiting access to personal information;
 - automatically deleting temporary processing data.
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12. User Rights

Subject to applicable law,users may request:

- access to their personal information;
- correction of inaccurate information;
- deletion of personal information;

- restriction of processing;
- withdrawal of consent;
- portability of certain information.

Requests will be handled in accordance with applicable data protection legislation.

13. Changes to This Policy

We may update this Policy periodically to reflect:

- legal requirements;
- regulatory guidance;
- operational improvements;
- technological developments.

Material changes will be communicated where appropriate.

14. Contact Us

If you have questions regarding this Policy or wish to request deletion of your personal information, please contact:

Opulume

Website: www.opulumeskin.com

Email: customerservice@opulumeskin.com

Postal Address:

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