

STEPHX

DATA RETENTION, DELETION AND EXPORT POLICY

Version 1.0

Effective Date: 1 June 2026

1. PURPOSE

StephX is a privacy-first, client-controlled narrative assembly and therapy-preparation platform.

This Policy explains:

- How information is retained.
- How information may be deleted.
- How information may be exported.
- How backup systems operate.
- How audit records are managed.
- How account closure is handled.

This Policy should be read together with:

- StephX Terms and Conditions.
 - StephX Privacy Policy.
 - StephX Clinical Boundaries and Appropriate Use Policy.
 - StephX AI Disclosure and Acceptable Use Policy.
-

2. GUIDING PRINCIPLES

StephX is guided by the following principles:

Client ownership of content.

Client control.

Privacy.

Transparency.

Security.

Accountability.

Data minimisation where practical.

Appropriate retention.

Appropriate deletion.

Appropriate auditability.

3. TYPES OF INFORMATION HELD

StephX may hold:

ACCOUNT DATA

- Name.
- Email address.
- Authentication information.
- Subscription information.
- Verification information.

THERAPIST DATA

- Professional credentials.
- Verification documentation.
- Registration details.
- Practice information.

USER CONTENT

- Story cards.
- Notes.
- Reflections.
- Questions.
- Session preparation materials.
- Categories.
- Tags.
- Attachments.
- User-generated content.

SYSTEM DATA

- Audit logs.
 - Security logs.
 - Access records.
 - Permission records.
 - Technical logs.
 - Error logs.
-

4. CLIENT OWNERSHIP

Users retain ownership of content they create within StephX.

Examples include:

- Story cards.
- Notes.
- Reflections.
- Questions.
- Attachments.
- Narrative content.

StephX does not acquire ownership of user content.

Retention of information does not affect ownership.

5. ACTIVE ACCOUNT RETENTION

While an account remains active, StephX may retain information necessary to:

- Operate the Platform.
 - Provide requested services.
 - Support sharing functionality.
 - Maintain security.
 - Support backups.
 - Maintain auditability.
 - Meet legal obligations.
-

6. CLIENT CONTENT RETENTION

Client content remains available while:

- The account remains active.
- The content has not been deleted by the client.
- Retention is not otherwise restricted by law.

Clients may delete content under platform functionality available at the time.

7. THERAPIST CONTENT RETENTION

Therapist-created content remains available while:

- The therapist account remains active.
- The content has not been removed.
- Retention is not otherwise required by law.

StephX does not determine therapists' independent record-keeping obligations.

Therapists remain responsible for complying with professional and legal record retention requirements applicable in their jurisdiction.

8. ACCOUNT CLOSURE

Users may request account closure at any time.

Account closure generally results in:

- Suspension of access.
- Termination of active services.
- Commencement of deletion processes.

Some information may continue to be retained where reasonably necessary for:

- Security.
 - Auditability.
 - Legal compliance.
 - Fraud prevention.
 - Dispute resolution.
 - Backup systems.
-

9. DELETION REQUESTS

Users may request deletion of personal information and content.

Deletion requests will be assessed in accordance with:

- Applicable law.
- Security requirements.
- Audit requirements.
- Legal obligations.
- Technical limitations.

Deletion may not be immediate.

Deletion may occur in stages.

10. USER-CONTROLLED DELETION

Where platform functionality permits, users may:

- Delete individual cards.
- Delete notes.
- Delete attachments.
- Delete reflections.
- Remove shared content.

Deleted content may remain temporarily in backup systems.

11. SHARED CONTENT

Where a client shares information with a therapist:

The client may subsequently withdraw sharing permissions where supported by platform functionality.

However:

- Therapists may already have viewed the content.
- Therapists may have incorporated information into clinical records.
- Therapists may have exported information.

StephX cannot delete information already incorporated into independent therapist records.

12. EXPORT RIGHTS

StephX supports the principle of user portability.

Users may request export of information they have created or uploaded.

Exports may include:

- Story cards.
- Notes.
- Reflections.
- Categories.
- Attachments.
- Shared content.
- User-generated content.

Export formats may evolve over time.

13. THERAPIST EXPORTS

Therapists may export client-authorised information where supported by platform functionality.

Therapists remain responsible for handling exported information in accordance with:

- Professional obligations.
 - Privacy obligations.
 - Ethical obligations.
 - Record-keeping requirements.
-

14. BACKUP SYSTEMS

StephX maintains backup systems to support:

- Reliability.
- Recovery.
- Security.
- Business continuity.

Deleted information may continue to exist temporarily within backup systems.

Backup systems are not intended to provide ordinary user access.

Backup retention periods may vary.

15. AUDIT LOG RETENTION

StephX maintains audit records to support:

- Security.
- Accountability.
- Compliance.
- Dispute resolution.
- Governance.
- Product integrity.

Audit records may include:

- Login activity.
- Access activity.
- Permission changes.
- Sharing events.
- Security events.
- Administrative actions.

Audit records may be retained for longer periods than ordinary content.

16. SECURITY LOG RETENTION

Security-related information may be retained where reasonably necessary to:

- Investigate incidents.
 - Detect fraud.
 - Prevent abuse.
 - Protect users.
 - Protect platform integrity.
-

17. DE-IDENTIFIED INFORMATION

StephX may retain aggregated and de-identified information after account closure.

Such information may be used to:

- Improve the Platform.
- Improve safety systems.
- Improve workflows.
- Improve AI systems.
- Support governance.
- Support analytics.

De-identified information is intended to remove reasonable means of identifying individual users.

18. LEGAL HOLDS

Where reasonably necessary, StephX may suspend deletion processes where information is required for:

- Court proceedings.
 - Legal claims.
 - Regulatory investigations.
 - Law enforcement requirements.
 - Compliance obligations.
-

19. BUSINESS TRANSITIONS

If ownership or operation of StephX changes, information may be transferred as part of a legitimate business transaction.

Any successor operator will be expected to honour applicable privacy obligations.

Users will be notified where required by law.

20. RETENTION PHILOSOPHY

StephX seeks to retain information:

- No longer than reasonably necessary.
- No less than reasonably necessary.

Our objective is to balance:

- Privacy.
 - Security.
 - Accountability.
 - User control.
 - System integrity.
-

21. CHANGES TO THIS POLICY

StephX may update this Policy from time to time.

Updated versions will be published within the Platform.

Continued use of StephX constitutes acceptance of updated versions.

22. CONTACT

Privacy and Data Governance

StephX

Andrew James Baartz

privacy@stephx.app

StephX believes users should remain in control of their stories while understanding how information is retained, protected, exported, and ultimately deleted.

Version 1.0

1 June 2026