Data storage, backup and retention for advice firms

Incendio Trading Limited (trading as RetireMe / Incendio Software)
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This statement describes how the **adviser platform** stores, backs up, and retains firm and client information. It is informational and does not amend our Adviser terms of business (PDF) unless we agree otherwise in writing. Operational details may evolve; this page reflects controls in place as at the version date.

1. Scope

This document covers the RetireMe **adviser / B2B platform** (tenant workspaces for financial advice firms). It does not describe the consumer household apps in detail, except where a contrast helps (consumer plans are local-first by default; optional Cloud Sync is a separate path).

2. What we store (live service)

Category	Examples	Where it lives
Firm & staff	Organisation branding, adviser accounts, roles, teams	Application database on our production VPS (Sydney, Australia)
Clients & CRM	Client records, notes, tasks, workflows, activity / audit events	Application database on our production VPS (Sydney, Australia)
Plans	Retirement plan data and plan versions used in modelling	Application database on our production VPS (Sydney, Australia)
Documents	Uploaded advice artefacts (e.g. SOA, KYC, agreements) and related metadata	Cloudflare R2 for file content; metadata in the application database (Sydney)

> Adviser-platform plan data is hosted so your team can collaborate. It is protected by organisation scoping, role-based access, HTTPS in transit, and operational backups.

3. Hosting architecture and geography

Incendio is a New Zealand company subject to the Privacy Act 2020. Physical storage locations for the adviser platform are:

- **Compute and database** — production application and MySQL run on a Vultr VPS in **Sydney, Australia**.
- **Document object storage** — adviser client documents are stored in a dedicated Cloudflare R2 bucket (`retireme-docs`) used as the live document store.

- **Off-server backup storage** — backup copies are pushed to a separate Cloudflare R2 backup bucket (`retireme-backups`), and may also be included in CloudPanel remote backup arrangements.
- **R2 residency** — those buckets use Cloudflare's standard R2 endpoint. Cloudflare does not currently offer a New Zealand jurisdictional restriction for R2; we do **not** claim New Zealand-only data residency for documents or backups.
- **Other subprocessors** — limited categories of data may also be processed by providers we use to run the service (for example email delivery or billing), under confidentiality and privacy obligations consistent with our terms.

> Australia is our primary compute region. Company ownership and NZ governing law are separate from where servers and object storage physically sit.

4. Backup architecture

We take layered backups so a single failure (disk, accidental delete, or host issue) does not leave the firm without a recovery path:

- **Daily database dumps** — MySQL dumps of the adviser databases are produced on a daily schedule and stored on the VPS under our backup directory structure.
- **Site / home remote backup** — CloudPanel remote backup captures the site home and related files on a daily schedule and stores them off the live application volume (configured to our backup object storage).
- **Document snapshots** — live adviser documents in the primary R2 documents bucket are copied daily into dated folders in the backup bucket. Copies are additive (dated snapshots) so an accidental delete in the live bucket does not immediately erase older snapshot folders.
- **Local retention on the VPS** — local dated backup folders are cleaned after approximately **14 days** once off-server copies exist.
- **Remote document snapshot retention** — dated adviser-document snapshots in the backup bucket are retained for approximately **30 days** (configurable operationally).

> Backup schedules and retention windows are operational controls. They are not a contractual uptime SLA and may be adjusted for security, capacity, or reliability reasons.

5. Retention while your firm is a customer

- **Live data** — we retain firm and client records in the live service for as long as your organisation remains a customer and the records remain in the product (including soft-archived or superseded items your users keep on file).
- **Firm-controlled deletion** — advisers and org admins can remove or supersede many records in-product (for example documents and CRM items). Deletion in the live product does not instantly erase every backup copy; backups age out according to the windows above.
- **No automatic "forget after N years" engine** — the platform does not currently enforce a firm-wide automatic purge calendar for all client data. Retention for advice-file purposes (including any AML/CFT or professional obligations) remains your firm's responsibility, supported by the vault and audit features you choose to use.

- **Legal holds** — we may retain copies longer where required by law, dispute, or security investigation.

6. Retention after termination or offboarding

Under our Adviser terms of business, when the agreement ends your access ends and each party must return or delete confidential information of the other, **subject to standard backup and legal retention practices**.

In practice that means:

- we disable or remove live tenant access as part of offboarding;
- we will work with you on a reasonable export of your business data where requested as part of orderly exit;
- residual copies may remain in access-controlled backups until those backup cycles expire, or longer if law requires; and
- we do not use residual backup copies to provide services to another customer.

7. Access to hosted data by Incendio staff

We do **not** browse firm or client records for marketing, curiosity, or unrelated product research. Hosted adviser-platform data may be accessed by authorised Incendio personnel only as needed to:

- respond to a support or troubleshooting request from your firm;
- maintain, secure, or restore the service (including backup verification and incident response);
- comply with law; or
- operate the service as described in our terms (for example processing required for hosting, email delivery, or billing).

We do not sell firm or client information. We do not disclose it to third parties except as needed to provide the Services through subprocessors, with your consent, or as required by law.

8. Related documents

- This statement (PDF)
- Adviser terms of business (PDF)
- Security and confidentiality for advice firms
- Business continuity for advice firms
- Legal pack for advice firms

9. Contact

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Print or PDF this page for firm due-diligence packs. Cite the version and date above when attaching to an email or RFP response.