

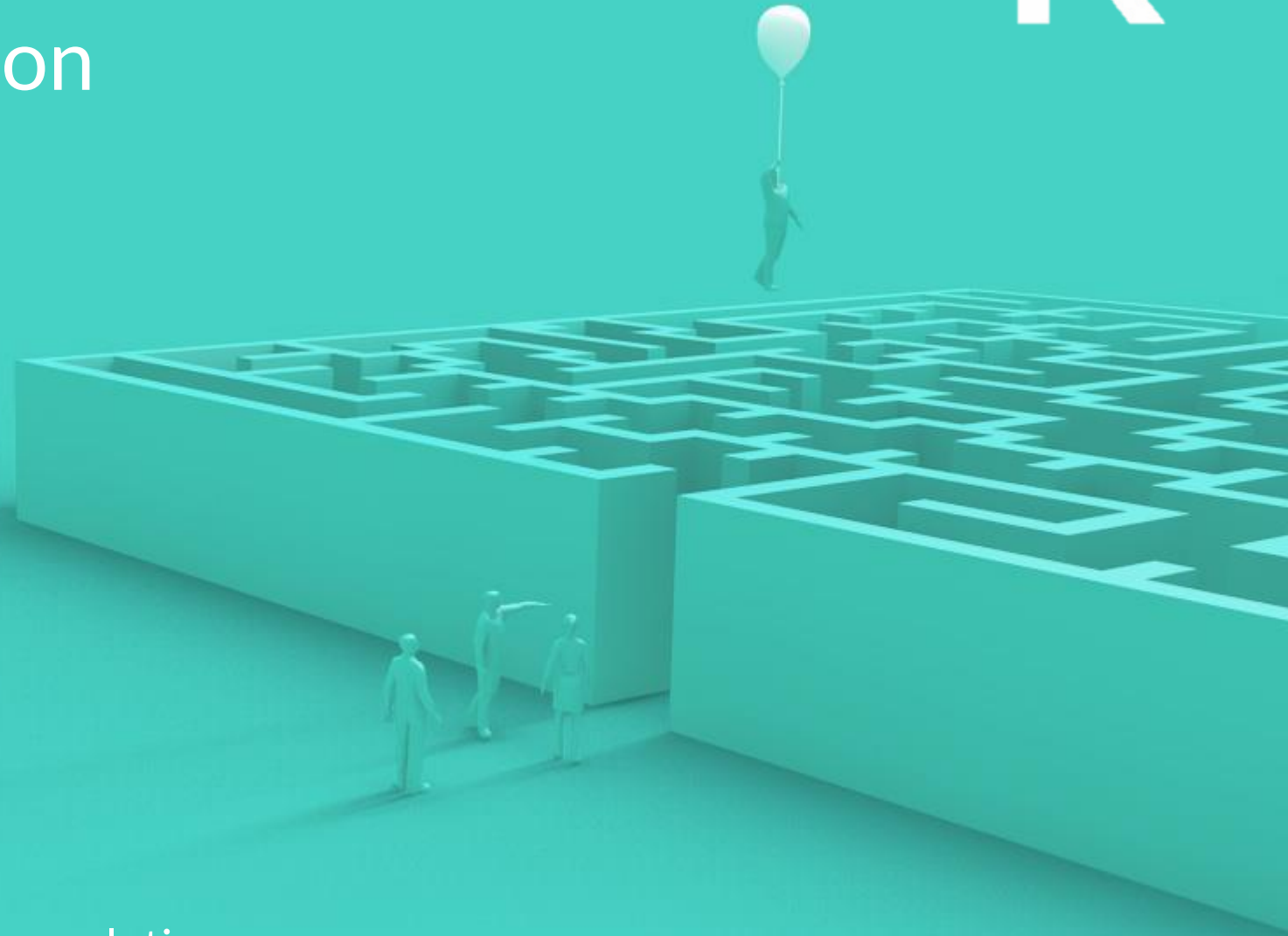


Solving records retention once and for all

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COOL
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2019

Your global data retention solution





0 countries

0 retention periods

0 customers

2 team members

Companies do not like to destroy data...



Weefselarchief

Behalve het verkopen van de inventaris worstelt curator Van Zanten met nog een paar andere ingewikkelde vraagstukken, zoals het onderbrengen van 4 kilometer aan papieren patiëntendossiers op een andere locatie. Bij wet is bepaald dat die dossiers tot 15 jaar na de laatste behandeling moeten worden bewaard. Een ploeg werkstudenten zit deze weken in de kelder van het Slotervaart die dossiers door te ploegen – alles wat ouder is dan 15 jaar wordt vernietigd. Naar verwachting blijft er dan nog 3 kilometer papier over. Ook de dossiers met stukjes weefsel van patiënten moeten worden verhuisd. Het Amsterdams Medisch Centrum heeft zich opgeworpen om dit weefselarchief te gaan beheren.

Record keeping – Russian style



filerskeepers

Russia retention schedule

Who	What to store	Minimum or maximum	Retention	Period	From	Legal reference
Employers	Individual data on work experience, earnings (remuneration), income and assessed insurance premiums of the insured person	Minimum	75	years	From the date of creation	Application to the order of the Ministry of Culture of the Russian Federation of August 25, 2010 N 558
Employers	Lists of employees' children	Minimum	0	days	From the date following the day of the replacement of the list	Application to the order of the Ministry of Culture of the Russian Federation of August 25, 2010 N 558
Employers	Documents (statements, inquiries, correspondence) about the provision of places in preschool and school institutions	Minimum	5	years	From the date of creation	Application to the order of the Ministry of Culture of the Russian Federation of August 25, 2010 N 558

To keep or to delete?



Sometimes companies want to forget:

- Laws (often data protection) tell them to destroy data
- Avoid holding on to evidence of breaches of contract or compliance violations
- Large amounts of data are perceived as unmanageable (and outdated data loses value)



Sometimes companies want to remember:

- Data represents tremendous value
- Laws tell them to retain data
- In litigations, having the right data available can mean the difference between winning or losing a case

Sounds easy?

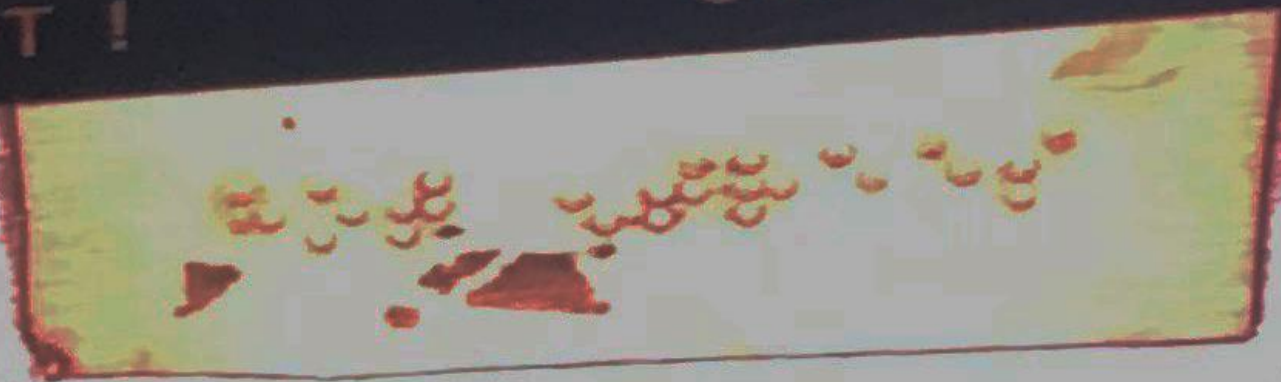


- A company's systems are used and accessed from many countries
- The laws of all these countries will then apply
- Per country there can be hundreds record retention obligations
- These laws are often conflicting
- **Example: Payroll records**
 - Should be stored at least 50 years in Poland and Romania
 - Should be deleted after 6 years in France



HOT !

CAUTION SURFACE IS HOT !





5 countries

550 retention periods

2 customers

2 team members

Not easy

FK



What if we would...



All the info you need

- ✓ Who should store
- ✓ What to store
- ✓ Minimum or maximum term?
- ✓ Exact start of the retention period
- ✓ How long to keep data
- ✓ A link to the legal source

In plain language

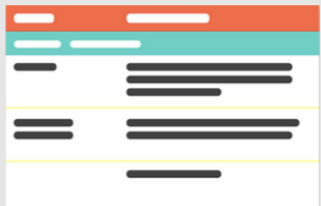
We insist on keeping it simple and actionable. So that you can actually implement the retention period.

No vague language such as “current +10 years” but “10 years following the date on which the book year ended”.



Simple design

Clean cut, printer-friendly and easy accessible and adjustable to your need. Feel confident sharing your retention strategy, whether you're updating your team or presenting to your board.



Always adding new countries

US (federal), Japan, Singapore, UK, France, Germany and many more. We got them. And we are always adding new countries to our collection.



Record keeping – Turkish style



Personal data						
Data controllers	Information relating to transactions regarding the deletion, destruction and anonymization of personal data	Minimum	3 years	From the date of deletion, destruction or anonymization	Article 7 Regulation on deletion, destruction or anonymization of the personal	
Data controllers	Personal data	Maximum	0 days	From the date the personal data was no longer necessary for the purpose for which the data are collected	Article 4 Personal Data Protection Law no. 6698	



15 countries

2,000 retention periods

5 customers

3 team members

GDPR vs records retention



GDPR triggered records retention hype

- Privacy justifies storage and removal of data
- Inspires greater data governance and accountability

Records retention

- Relates to personal data and non-personal data
- Does not only tell when to delete, but also when to keep

Why privacy professionals should listen to retention specialists

- They know thousands of reasons to keep data
- They know when to delete
- They can give examples when talking to data protection authorities

Why retention specialists should listen to privacy professionals

- Virtually every minimum term is a maximum term
- They know a risk-based approach to data!

5 things GDPR specialists don't tell about retention

1. When to keep personal data
2. Why to keep personal data
3. How to keep personal data
4. What personal data to store
5. How long to keep personal data





Companies are waking up to the idea that:

- Keeping records forever is just not allowed in most countries.
- Compliance in one country can lead to non-compliance or loss of litigation position in another

While:

- A granular approach to records retention technically impossible
- Global systems often do not allow a per country/document approach

Result: companies will need to implement simple custom tailored golden standards to ensure compliance with most record retention requirements instead of all.

Companies
are forced
to make
choices



Record keeping – Italian style



Employers	Information relating to preventive, periodic or requested medical examination of workers over 50 years for risks in particular relating to risks to eyesight and eyes and to the musculoskeletal system	Minimum	2 years	From the date of the date of the medical examination	Article 176 Work safety decree
Employers	Information relating to preventive, periodic or requested medical examination of workers under 50 years for risks in particular relating to risks to eyesight and eyes and to the musculoskeletal system	Minimum	5 years	From the date of the date of the medical examination	Article 176 Work safety decree



30 countries

7,000 retention periods

20 customers

5 team members

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8 steps to create a perfect retention policy



1. Determine your retention strategy (“data hoarder” vs “strategic litigator”)
2. Determine your governance
3. Determine what deletion means
4. Don’t miss out on important categories



Data categories included – at a minimum



- ✓ Accounts and legal records
- ✓ Tax records
- ✓ HR records
- ✓ Health & safety records
- ✓ Environmental records
- ✓ Transport records
- ✓ Personal data & data privacy records
- ✓ And various industry retention periods

8 steps to create a perfect retention policy



- 5. Establish your golden standards
- 6. Create actionable retention periods
- 7. Ask for feedback from data users
- 8. Never forget about the law





48 countries

12,000 retention periods

75+ customers

8 team members

Implementing that perfect policy (best practices)



All about the data ownership and management buy-in, and:

- ✓ Set up a data retention taskforce
- ✓ Create a long-term implementation plan
- ✓ Find the right place where data is stored
- ✓ Find quick wins together with stakeholders
- ✓ Always look ahead
- ✓ Organize clean desk days
- ✓ Use anonymization and pseudonymization



The challenge of unstructured data: email



Email is not a record and not an archive!

Disadvantages of an email box:

- ✓ Not compliant
- ✓ Access, but poor searchability
- ✓ No proper access rights
- ✓ When they leave it is gone...

Two possible solutions:

- ✓ Use the tools available, create structure
- ✓ Set generic data retention periods for users





52 countries

14,500 retention periods

80+ customers

8 team members



Building an ecology to solve records retention

- Build a solid template data retention policy, make choices
- Develop a taxonomy of retention periods and unique identifiers per retention period
- Develop database and APIs to integrate with partners and customers
- Engage in meaningful collaborations with implementation partners (e-discovery partners, data management partners, consultants, DPIA)
- Publish all countries our customers need

Whatever you do, don't...



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