

Retention Policies – Are you UP-TO- DATA

(This presentation will have an SAP focus)

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What is a Data Retention Policy?

A protocol within an organization for retaining information for operational use while ensuring adherence to the laws and regulations concerning them.

It is the first step in protecting an organization's data against financial, civil, and criminal penalties.

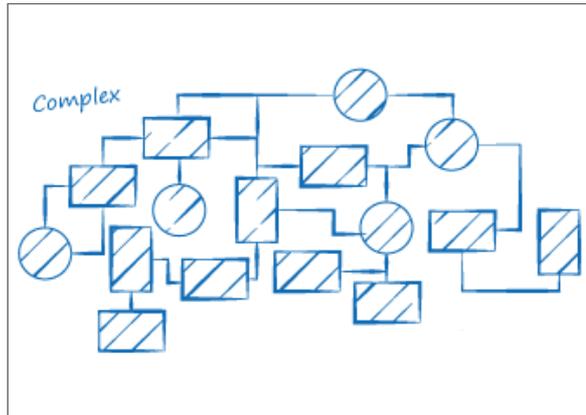
Retention Challenges



**Lengthy Retention
Periods**



Protect Privacy



**Complex
Retention
Requirements**

Retention for Various Periods

- Retention is increasingly important as audits become more complex
- Organizations must retain data for variable periods of time



- Multi-national companies need to balance different retention requirements for different jurisdictions

Retention for Various Regulations

- Data is retained for financial audits
 - Such as Sarbanes-Oxley (SOX), under the direction of PCAOB
- Other regulations can impact retention periods:
 - PII: Personally Identifiable Information
 - PIPEDA: Personal Information Protection & Electronic Documents Act
 - PHIA: Personal Health Information Act
 - HIPPA: Health Information Protection Act (USA HIPAA)
 - PCI DSS: Payment Card Industry Data Security

Retention for Various Lines of Business



Applying retention rules is complex because it requires collaboration between diverse lines of business:

- Finance/HR
- Legal
- IT

Retention Requirements for Electronic Data

Many companies spend hours reviewing and approving their retention policies without taking into account how it impacts electronic data

Keep Information

- Keep information to support legal requirements
- Keep information indefinitely to ensure compliance
- More storage required



Reuse Storage

- Keep information only as long as it supports business operations
- Delete legacy information as soon as possible to reduce risk
- Lower cost of storage

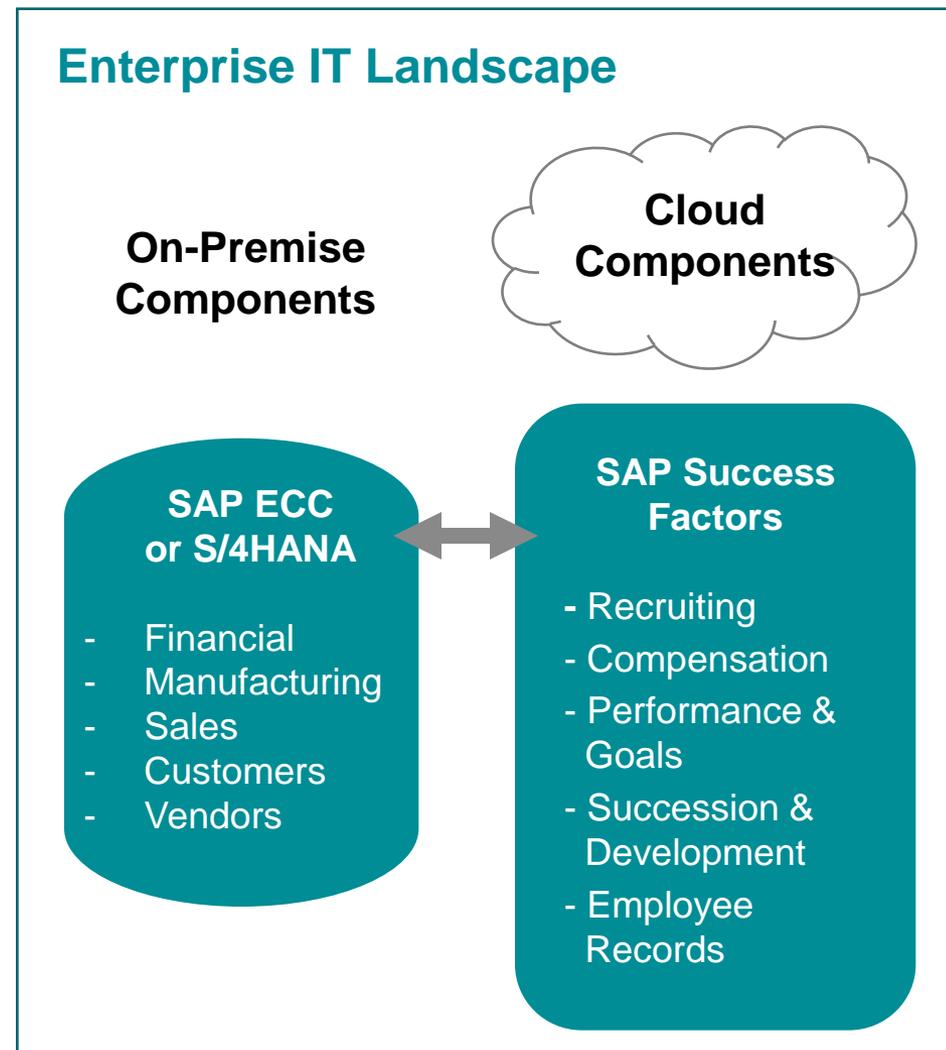
Reviewing Retention Policies for Electronic Data

Retention policies should be reviewed when:

- New systems are added to IT landscape (such as cloud)
- Business goes through a transformation:
 - Mergers or acquisition that adds new data responsibilities
 - Divestiture can have legal rules governing how data is handled
- New laws and regulations are put in place (Britain leaves EU)
- Increased threats from hackers going after personnel and business data
- Other reasons

IT Landscape Changes Affect Retention

- New Enterprise Systems (SAP HANA or Cloud-hosted solutions) change the way business data works; therefore it changes your Retention Policies
- Hybrid IT environments are more complex as data is stored on-premise and potentially in the cloud



Some Data Requires Unique Retention Policies

Some data has unique legal/audit set rules:

- Employee Personnel Info for Latin America, Canada and EU countries where individuals do not “consent” to their data being used
- Divestitures or other corporate agreements can limit what data a company can keep

NOTE: Retention Policies MUST apply to data AND documents or other attachments that contain information and are linked in the System

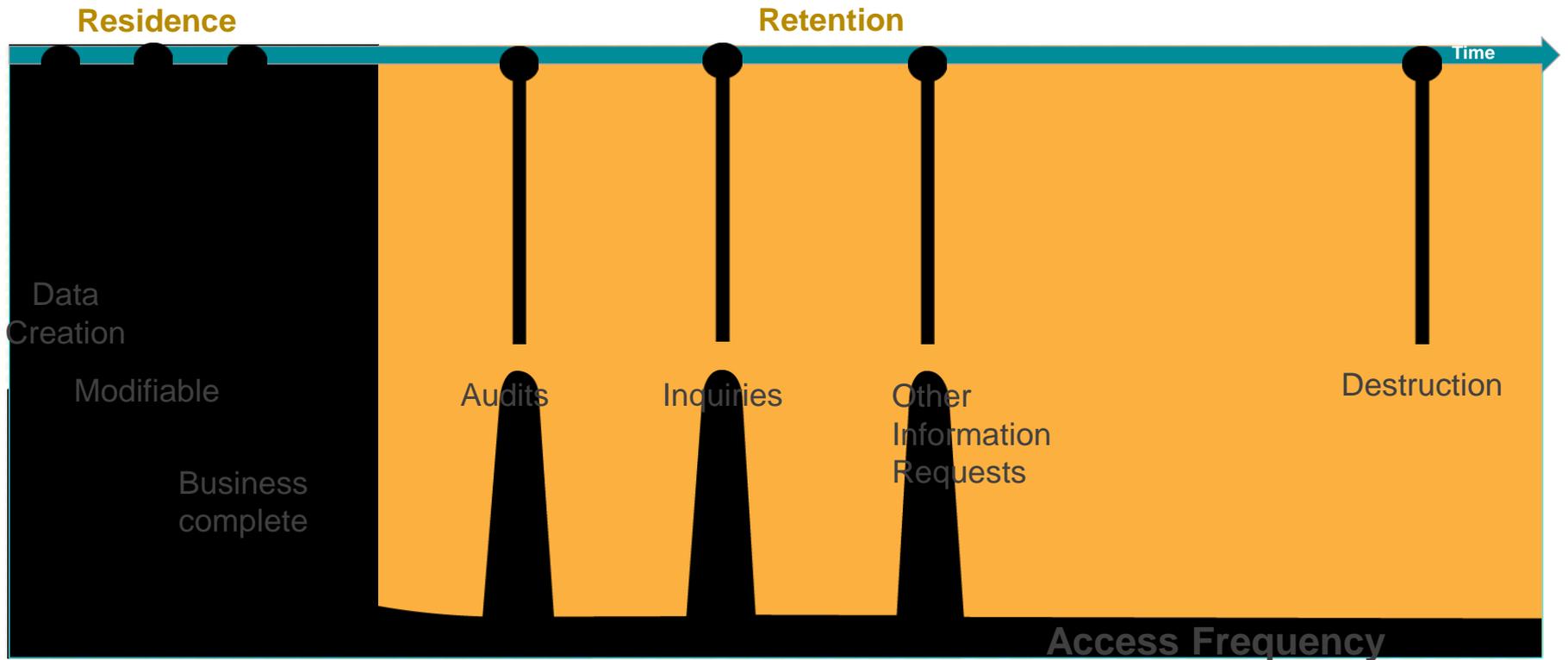
Legal Holds

A small subset of data must be retained indefinitely for Legal Holds

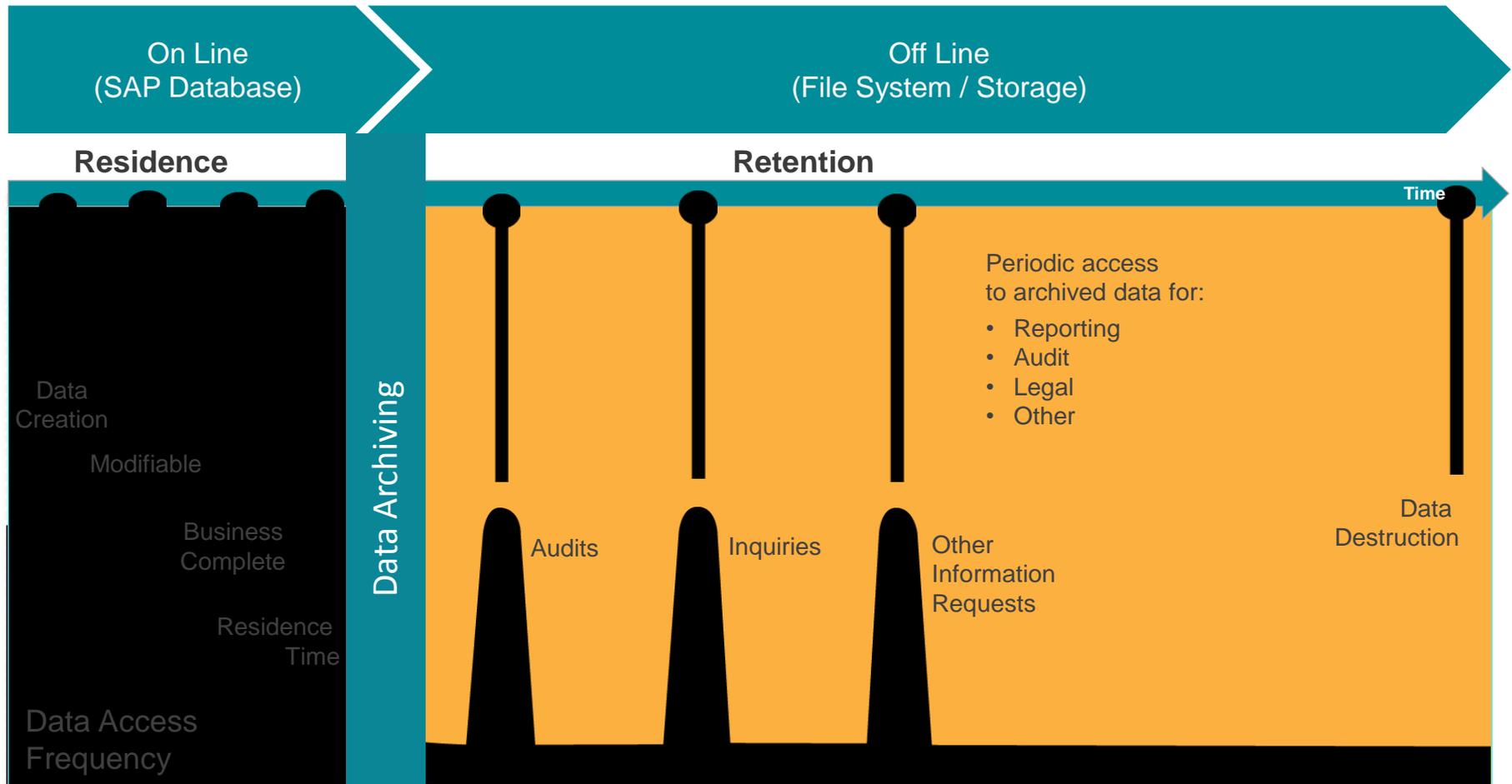
How do you do this?

This is a main reason groups may chose to not follow policies (what if scenarios)

Information Lifecycle in Enterprise Systems



Archiving Supports Data Retention



Manage Complex Retention Rules



The largest diversified provider of post-acute care services in the United States

Business Need

- Delete HR information data and attachments according to complex retention rules based on data retention rules
- Extract HR information to support litigation

Solution

- Dolphin archive retention cockpit enables rules to be applied to production and archived data

Results To Date

- Ensure privacy requirements are met
- Lower cost of storage of long term data
- Increase speed in response to litigation

Remove HR Data After Divestiture



American petroleum refining, marketing, and transportation company headquartered in Findlay, Ohio.

Business Need

- Divestiture of division required company to remove HR data for former employees within 1 year of split
- Highly regulated industry required retention policies applied consistently to electronic data

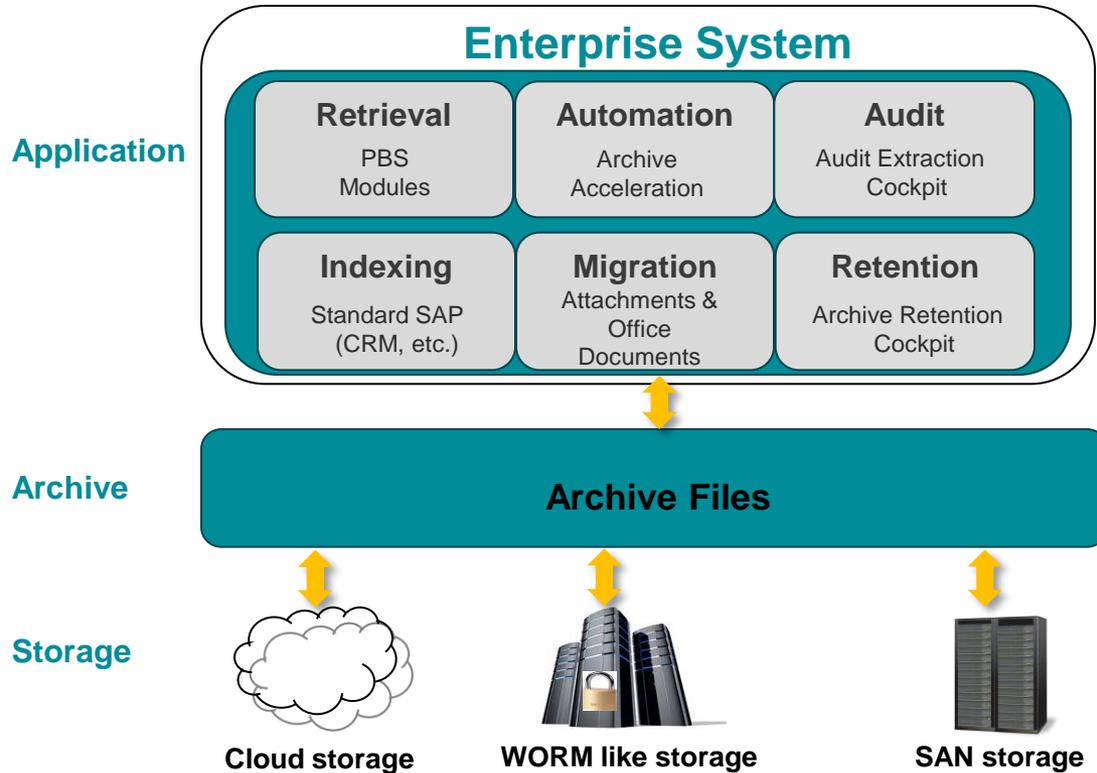
Solution

- Configure HR Payroll and Time data to ensure data is complete, archived and retained according to policies
- Archive and purge HR data belonging to divested company

Benefits

- 1TB of system space recovered from archiving with estimated 1TB reduction in data growth each year
- 60% reduction in HR data
- Faster reporting, faster back up and maintenance, and improved compliance

Best Practices for Data Management



Consider retention as part of a larger data management strategy

A Retention Action Plan!

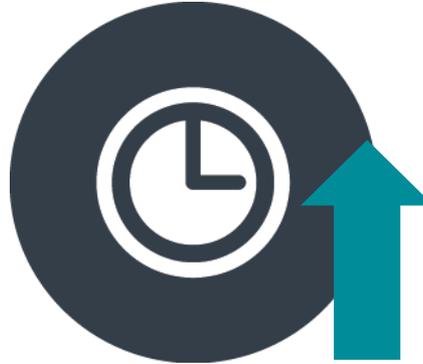
- Work with IT and Business Groups to understand the impact of changes to the IT infrastructure on Data Retention
- Work with Legal to understand recent changes to Data Retention policies
 - Lately the only rule here is these rule keep changing
- Automate the retention process to ensure continual data management
 - Archive data for long term retention; purge data no longer needed
- Ensure you have the ability to access retained data (including documents/attachments) easily
- Ensure there is an approved process for purging data – use workflows to ensure appropriate approvals are collected
 - Also good for protecting “Legal/Audit Hold data”
- Implement a regular review process (annually at least) to ensure Retention Policies are kept up to date

Benefits of Retention for Audit and Compliance



Lower Costs

Reduce the cost of storing data and documents for long periods



Increase Efficiency

Simplify the process of retaining data and documents according to legal requirements



Improve Controls

Secure data and documents and flexibly comply with legal retention requirements

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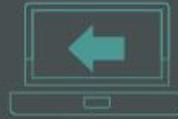
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