

# Records management processes and procedures

Establish the policies, processes, and controls needed to secure personal and other types of sensitive information, develop and drive the compliant, secure, and safe use of generative AI, and organize and integrate unstructured data in mergers, and accurately in divestitures.

Organizations today must balance multiple information governance priorities: protecting sensitive data, managing personal information under evolving privacy laws, supervising the adoption and use of generative AI, organizing and integrating unstructured data in mergers, and developing effective and defensible eDiscovery processes.

Contoural helps organizations build frameworks that address each of these fronts, as well as crafting policies and processes across different areas that are consistent, integrated, and do not conflict with each other. This provides the structure needed for organizations to confidently govern data, wherever and however it lives.

## Our services

### Data security classification

Up to 10% of an organization's data houses sensitive information, encompassing personal, financial, and business data. Even when sensitive data resides in secure repositories, leaks to unsecure areas can occur as data shifts for convenience, storage limits, or transitory reasons.

This poses breach risks which are magnified by increasing data volume and potential unsecured locations. Unauthorized access, theft, or misuse of sensitive information by insiders, often employees with legitimate access, can also occur. At the same time, companies face multiple sets of information security requirements imposed by industry-specific regulations, local jurisdictions, contract provisions, or special situations including GDPR, US state privacy rules, SEC rules, and HIPAA.

Managing security standards for different data subsets is complex. A single, comprehensive Data Security Classification Policy is more efficient, covering global requirements (including industry-specific demands), accounting for exceptions, and referencing additional standards and procedures. We support organizations in:

- determining what types of sensitive information they access, transmit, store, and manage
- assessing risk
- deciding appropriate security controls for each type of content, repository, and data management activity
- creating an ongoing process for identifying, classifying, improving, and implementing data security over time

Our Data Security Classification Policy and Standard development and update service defines information sensitivity levels and establishes specific protection, handling, access, transmission, storage, and disposition requirements for each level. Key components include:

- Policy direction
- Security classification levels
- Data security controls
- User-friendly content classification
- Unified enterprise security standards
- Automated sensitivity organization
- Not technology-specific
- Integration with overall information governance initiative

Covering legal requirements, privacy, and corporate confidentiality, a Data Security Classification Policy and Standard supports organizations in managing and protecting sensitive information across the enterprise and streamlining policies for comprehensive implementation and automation.

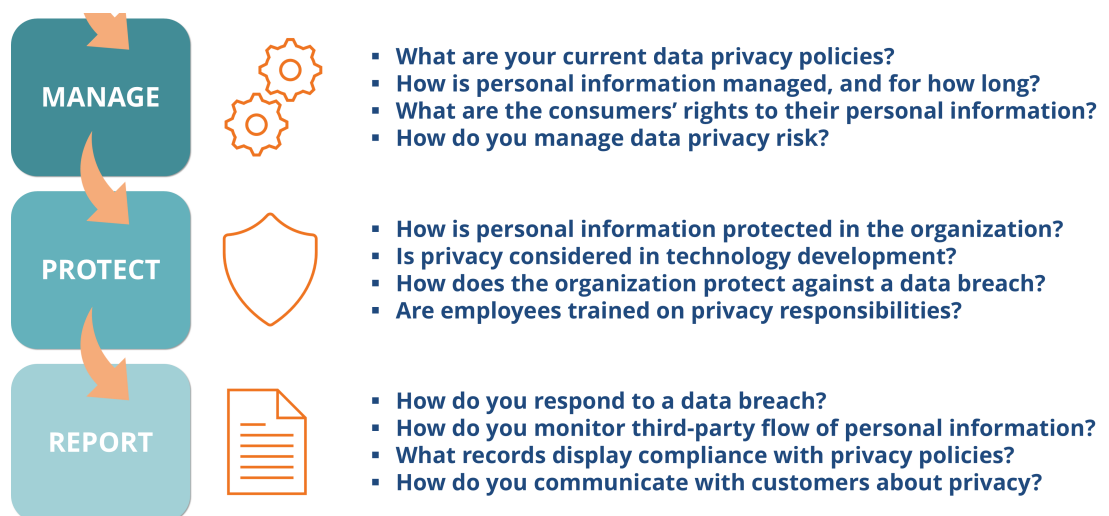
## Privacy Program

With new and changing legal and regulatory privacy requirements and increasing privacy-related risks, companies need to be able to manage privacy information in a compliant, efficient, and scalable manner. Our privacy program services combine policies, processes, technology, training, monitoring, and auditing to help organizations identify, classify, secure, manage, and delete sensitive information across electronic and paper media.

We support all stages of privacy program development, from foundational assessment and planning to operational processes and training, defensible disposition and monitoring, and organizational development and staffing, including:

### **Privacy Assessment and Roadmap**

A privacy assessment and roadmap ensures that an organization targets an appropriate privacy program maturity level based on factors like the number of consumers whose privacy information is held, the quantity and breadth of this information, how widely it is shared, and how it is stored and managed. The privacy assessment includes document review and high-level interviews. The process also engages, early in the project, a number of key stakeholders required for a successful program.



The resulting strategic roadmap includes recommended projects and activities, major tasks, required resources and technology, cost estimates, and potential timelines.

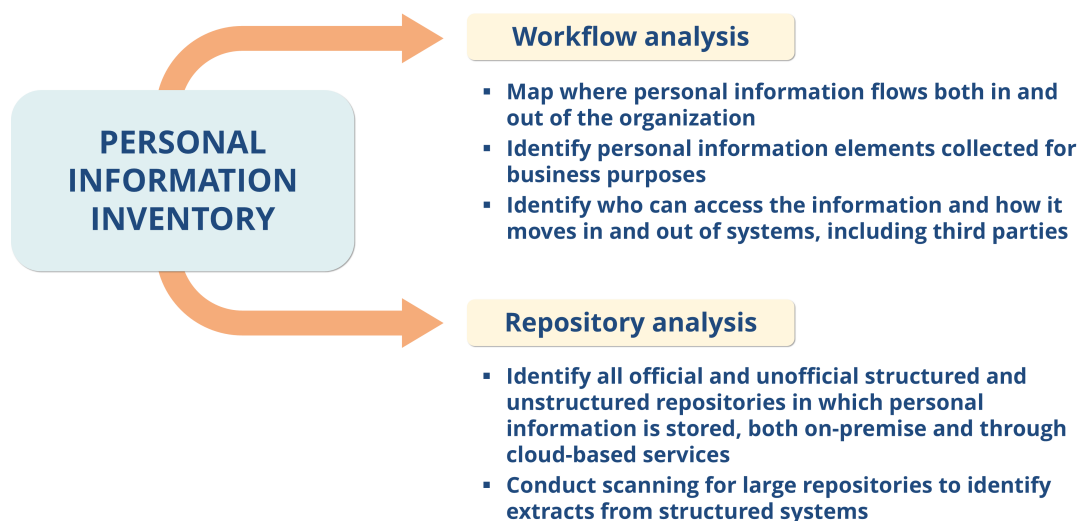
## Personal Data Inventory

We identify and document all personal information that an organization collects, uses, stores, shares, and transfers across systems and processes.



The process of creating a PDI reveals patterns that may be unique to each business, helping to identify privacy data. Some privacy data can be identified through technology that searches for known patterns like social security numbers, addresses, drivers' licenses, and 'regular expressions.' Other types of privacy data, such as inference data, may require more advanced search techniques.

The PDI includes a workflow analysis, mapping all processes that involve collection and use of personal information, who has access to this data, to whom the data is transferred outside the company (if anyone), and how long the personal data is stored in each location. It also includes a repository analysis, identifying all locations where personal data may be stored such as databases, email, and file shares, both on-premise and cloud-based, and including all designated locations of this data: the original source as well as any inadvertent copies.



### **M365 Personal Data Inventory Portal**

We design and build a Personal Data Inventory portal that leverages the capabilities of M365 to track and manage personal information.

### **Privacy Policy Development and Refresh**

We identify any gaps in privacy policies, notices, and opt-out documentation, recommend changes, and provide updated documentation for policies including, but not limited to:

- Updated Privacy Policies (an agile baseline privacy capability that can be easily adapted as new requirements emerge, rather than designed to meet a single state or country's privacy requirements)
- Privacy Notices
- Consent Notices
- Deletion Procedures
- Data Security Classification Standards
- Privacy Impact Assessment
- Data Breach/Incident Response Plans

### **Disposition and Monitoring**

We develop processes for defensible disposition and remediation as well as privacy audit, monitoring, remediation, and recordkeeping.



### **Privacy Training and Fractional and Transitional Privacy Staffing**

We conduct privacy training for staff and offer fractional and transitional staffing by experienced privacy professionals for day-to-day privacy program services

Our tailored approach focuses on ensuring compliance, reducing risk, enabling operability and scalability, and designing with the flexibility to meet new or changing privacy requirements, all in a cost-effective manner.

## **AI Readiness**

AI promises tremendous leaps in productivity, revenue, cost savings, and innovation. But while organizations are racing to adopt generative AI, most lack the governance structures to deploy it safely and effectively.

- How will we be using AI?
- In what countries will we be using AI?
- Will we be compliant?
- How do we make sure we don't leak confidential information?
- How do we know we will be feeding AI good data and not bad data?
- Will AI be accurate? What happens if it hallucinates? What is our liability?
- Will these large language models train on our proprietary data?
- Do we need to apply an AI framework to be officially compliant? Which one?
- Do we need new policies? To update our old ones?
- Will we address these questions before we move AI into production?
- Who at our company is managing all of this?

We work with organizations to assess, establish, and implement policies and procedures for compliant, transparent, and ethical use of AI in order to safeguard employee and company data, ensure compliance with new and changing regulatory requirements, and identify high-quality data for AI use. Our AI readiness services include:

### **AI Readiness Assessment and Strategic Roadmap**

We conduct an assessment of strengths, weaknesses, and risks for AI governance policies and implementation based on the organization's profile and current policies and protocols. Key to Contoural's approach is assessing and socializing needs early with a larger group of stakeholders, which ultimately speeds up program development.

The strategic roadmap identifies gaps between the current state and the desired level of AI governance maturity and puts in place a plan to achieve target maturity in each of the main areas addressed. Determining in detail and at the beginning what needs to be done, at what level, by whom, what resources are required, and anticipated costs, speeds up this type of complex project.

### **AI Governance Policy**

An AI Governance Policy sets out the compliant, transparent, and ethical use of AI for the organization, detailing how AI should be used, safeguarding employees, and ensuring compliance with regulatory requirements. Having up-to-date policies provides defensibility if an AI system faces review from a regulator, demonstrating the organization is mindful in its use of AI and diligent in its compliance efforts.



**Emerging  
global AI  
compliance  
and privacy  
rules**



**Input Data  
Quality**



**Leakage of  
corporate  
confidential  
information  
and trade  
secrets**



**Ethical and  
transparent  
use  
of AI**



**AI accuracy,  
correctness,  
and safety**

### **Fractional Staffing**

Our expert consultants provide fractional or temporary support to help you operationalize controls, train stakeholders, and embed governance.

Rather than slowing down progress, a well-designed AI Governance program drives faster and more effective application development and deployment. Ensuring that concerns and risks are addressed early on avoids the need to redesign or rework systems on the tail end.

## **Discovery Response and Legal Hold**

Organizations face major risks and costs when litigation occurs. Because of the urgency involved, discovery actions and legal holds can disrupt business operations and consume available resources, making it hard for a company to get out of the reactive discovery mindset. A lack of proactive discovery processes can mean scrambled responses, potential spoliation of evidence under legal hold, and uncontrolled vendor expenses resulting in court sanctions or adverse verdicts. Instead of waiting for discovery requests to appear, organizations need to anticipate and prepare for future litigation requirements.

With proactive, documented, customized, and defensible information management processes and procedures that lower risk and reduce cost, organizations can manage litigation matters strategically and effectively instead of remaining trapped in reactive mode.

We guide counsel and other stakeholders in the planning and execution of each stage of the discovery response process, including workflow diagrams to demonstrate each of the discovery phases and how they fit together. Customized to the organization's litigation profile, needs, and resources, coordinated across legal, IT, and business units, and reflecting industry best practices, these defensible, cost-controlled processes work consistently across all litigation matters.

## M&A Unstructured Data Integration

While companies carefully plan for consolidating structured data found in applications and databases, unstructured data integration is frequently an afterthought, despite the fact that unstructured content may include intellectual property, operational knowledge, customer records, contracts, and employee files that are vital to the acquiring organization.

Our phased approach to post-deal unstructured data integration incorporates change management with thoughtful planning and execution, ensuring that valuable knowledge is retained and quickly made available while ROT and obsolete information is filtered out.



The result is an integrated information environment that supports employees, meets legal and regulatory requirements, and contributes to realizing the deal's intended synergies.

## Governance Processes and Procedures

Using a set of foundational best practices, we work with organizations to review, create, and update governance processes, procedures, guidelines, and reference materials that help program managers, record coordinators, and employees comply with the records retention policy and schedule and manage the overall information governance program.

Although most records should be classified and managed through a routine automated process, additional processes and procedures are needed to capture, classify, manage, and dispose of records and information created or received outside of these everyday processes. This includes, but is not limited to:

- departing employee records
- voicemail and chat guidelines
- email management
- scanning guidelines
- paper records management
- compliance audits and self-assessments
- annual records clean-up
- M&A and site closures
- policy and schedule change requests

We review and develop procedures, process documents, and other materials in accordance with best practices to support the administration of a records management and information governance program.

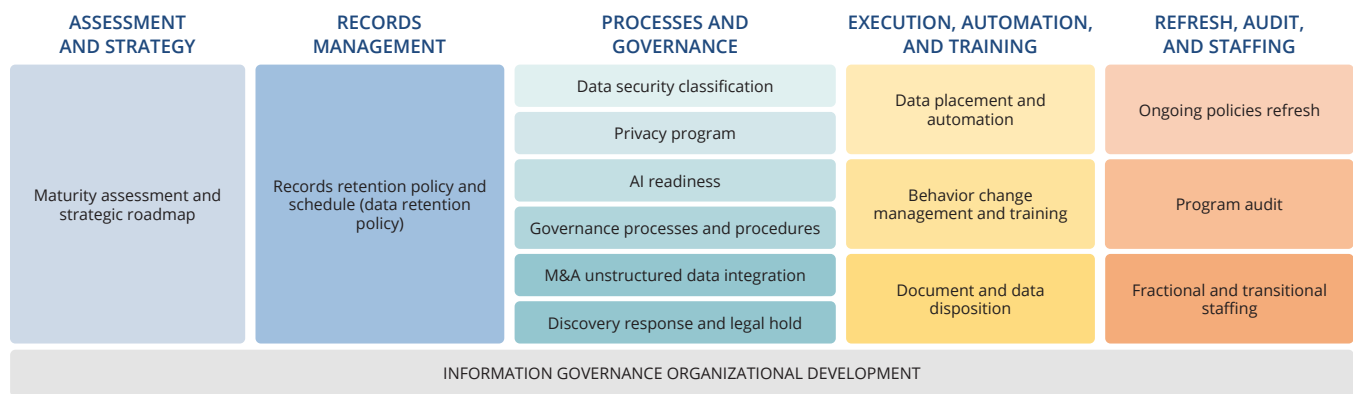
# About Contoural

Contoural is the largest independent provider of strategic records management and information governance, privacy, and AI readiness consulting services, serving more than 30% of the Fortune 500 along with numerous medium and small enterprises, non-profits, and public sector organizations.

We do not sell products or take referral fees. Our seasoned team of attorneys, compliance officers, records managers, IT professionals, and change management experts brings both deep industry-specific knowledge and a proven methodology refined across hundreds of engagements worldwide.

## What we do

We offer the industry's most comprehensive suite of information governance strategic consulting services, from assessment and planning to execution, training, and staffing.



TRUSTED BY  
**30%**  
OF THE FORTUNE 500

PROGRAMS  
IMPLEMENTED IN  
**150+**  
COUNTRIES

INDEPENDENT  
CONSULTANTS WITH  
**26**  
AVERAGE YEARS OF  
EXPERIENCE

## How we help

Our expert consultants help organizations ensure compliance, mitigate risks, reduce costs, achieve executable outcomes, and enhance employee collaboration and productivity, all based on their unique profile.



### INDEPENDENT

We do not sell or resell products, take product referral fees, or provide discovery services. Our advice is based solely on the needs of our clients.



### EXPERIENCED

With both deep and broad experience within and across industries, we leverage our tried-and-true methodology and the expertise of our consultants.



### CROSS-FUNCTIONAL

We work with major stakeholders in legal, privacy, compliance, records management, IT, information security, and business units to create consensus and execute projects.



### GLOBAL

Having developed programs for information governance operations in 150+ countries, we understand local requirements and can integrate these into a global program.

## Our approach

Developing and executing records management or information governance, privacy, and AI readiness programs can feel like climbing a steep mountain. Choosing the right path to ascend is difficult. Some routes are shorter but very steep, while others are longer but more gradual.

We employ a divide and conquer strategy, breaking the effort into manageable steps over time and identifying 'quick wins' that build momentum and buy-in throughout the process. Many clients participate side by side in our engagements, leveraging them as skill-building opportunities.

*The name "Contoural" comes from our founder's passion for trail running. Understanding the contours on a topographical map can suggest the best way forward.*

## Contact us today:

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