STRATEGIC INFORMATION GOVERNANCE CONSULTING SERVICES

SERVICE OVERVIEW

Records retention policy & schedule (data retention policy)

The industry's most compliant, comprehensive, and easy-to-execute records policies and schedules.

Organizations are inundated with paper and, especially, electronic information. At the same time, companies face stricter legal and regulatory requirements, new privacy rules, the threat of sensitive or confidential data exposure, and potential litigation risk and cost. Not least, the accumulation of electronic documents hurts employee productivity, with high-value information getting lost among the clutter.

We have worked with hundreds of companies, including 30% of the Fortune 500, to develop global record retention policies and schedules (data retention policies) that help organizations meet legal and regulatory requirements, comply with personal information disposition rules, mitigate risk, and address business needs.

Develop and maintain records retention policies and schedules that ensure the right information is kept for the right amount of time to meet legal, regulatory, privacy, and business needs and is defensibly disposed of when no longer needed.

What questions will a records retention schedule answer?

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- What are our legal and regulatory recordkeeping requirements, both domestically and globally?
- Which types of information hold significant business value, such as intellectual property, trade secrets, and key business processes? How long should we retain this information, and how do we distinguish it from low-value data that employees might keep indefinitely?
- How do we build consensus across all business units on what information to retain and for how long? How can we identify and agree on what should be deleted, extending this approach to files, emails, and other electronic data?
- What strategies ensure we capture records in all formats, including files, emails, and databases?
- How do we identify both common records, such as payroll, and those unique to our organization?
- Should we address the retention of drafts or voicemails, and if so, how?
- How can we resolve potential conflicts between recordkeeping requirements and privacy?
- What steps are needed to create a records policy and retention schedule that is modern and defensible?
- How can we design a records retention schedule/data retention policy to facilitate automation and ensure accessibility for users?
- How do we make our records schedule clear, prescriptive, and easier to execute?
- How do we ensure our records retention policy and schedule are defensible in the face of legal or regulatory scrutiny?

Our records management services

Global records retention policy and schedule

We have worked with hundreds of companies, including 30% of the Fortune 500, to develop records retention policies and schedules that are defensible and easy to execute. Our innovative approach builds a consensus across key stakeholders, business units, and departments on what information should be saved and for how long (and what not to save), producing a modern policy and schedule that is tailored to your organization's legal and global regulatory requirements, risk appetite, litigation profile, and business needs, as well as being easier to execute and automate.

An effective records retention schedule will contain many of the following attributes:

- ✓ ***Accurately identifies legal and regulatory requirements across more than 165 countries***

  The schedule is designed to meet global legal and regulatory requirements, including federal, state, provincial, country-specific, industry-specific, and international obligations. It clearly defines minimum retention periods, trigger events, and specific record categories maintained in the ordinary course of business.

Records Retention Policy and Schedule vs. Data Retention Policy

Organizations may use different terms, including ***records retention schedule***, ***document retention policy***, ***information retention and disposition policy***, or ***data retention policy***, to describe the same policy.

Despite variations in terminology, these terms all refer to what should be a single policy outlining overarching principles and guidelines for managing retention and disposition of information. A records schedule, typically an appendix to the policy, identifies which information qualifies as records and defines their retention periods.

Each organization may choose the terminology that best aligns with its internal preferences or practices.

- ✓ ***Captures all records across media types***

  The schedule applies equally to electronic documents, email, files, databases, collaborative platforms, social content, and paper. Records are defined by content, not format.

- ✓ ***Includes both typical and company-specific records***

  Identifies not only common but also organization-specific records. More than 30% of a company's records may be specific or even unique to that organization. Our schedules capture all records.

70% **common or typical records**	**30%** **company-specific records**
Accessed less often. **Easy to include in schedule.**	**Accessed more often.** **More relevant in litigation or regulatory inquiry.**
FINANCE HR ADMINISTRATION REGULATORY	OPERATIONS PROCESSES PROGRAMS INTELLECTUAL PROPERTY TRADE SECRETS BUSINESS VALUE

Two similarly-sized organizations in the same industry may have very different company-specific records.

- ***Includes both legal and regulatory requirements and business value***

  Information may also warrant retention because of its business, operational, or strategic value. Defining records based solely on compliance requirements ignores information that supports productivity and business objectives. Distinguishing high-value business information from expired, redundant, or low-value data allows organizations to maintain a single, unified framework and enable productivity, innovation, and collaboration by reducing unnecessary information clutter.

- ***Clear, plainspoken, and practical***

  Retention schedules must be easy to understand and easy to use. They should clearly define what is and is not a record, record category names based on what the company calls them, include realistic examples of records and non-records, avoid unexplained acronyms (like "ACT"), and spell out retention triggers in plain language. The schedule should maintain a manageable number of categories.

  Organizing the schedule by business function helps employees quickly and confidently find the right retention guidance.

- ***Synchronizes privacy data minimization rules***

  Most privacy laws are grounded in data minimization principles, requiring organizations to retain personal information only as long as necessary for legitimate business purposes. Retention schedules should explicitly address personal data by identifying the types of personal information within each record category and documenting the justification for retention. This supports defensible deletion, regulatory readiness, and data access request response.

- ***Create a consensus with the business on what to save and not save***

  Effective schedules seek to build a consensus on what to save and what not to save. Our experience shows that the most successful disposition efforts (getting rid of 70 or 80 percent of unneeded files, for example) occur when business units and departments are included on policy discussions and a consensus is reached. This drives alignment and shared ownership and creates practical buy-in that supports long-term adoption and compliance

- ***Provides a global schedule with local exceptions***

  A single global schedule with defined local exceptions is generally more effective than maintaining multiple country-specific schedules. While recordkeeping requirements vary by jurisdiction, differences are often manageable within a unified framework. This approach simplifies implementation across systems and regions.

Contoural's records retention policies and schedules are client-owned and open format. We delivered our work in an open, non-proprietary format with no ongoing subscription or maintenance fees or schedule "lock in".

Early victories build momentum and buy-in throughout the process, in contrast to a single win at the end of prolonged projects.

Global citations index

We create a detailed listing of legal and regulatory requirements supporting retention for each record class listed in the schedule, with the ability to determine specific requirements by country, province, or region according to areas of operation.

Contoural attorneys ensure citations are relevant to the organization's industry and operations, up-to-date and reflective of any recent changes, and accurate (not misclassifying or mismatching a regulatory requirement with the specific record type). The citations index:

- Maintains clear citation language to support defensibility during audits, regulatory inquiries, or litigation.
- Enables organizations to demonstrate a documented, research-based rationale for their retention schedule.
- Simplifies updates when laws change by centralizing and organizing all supporting authority in one structured index.

Contoural produces compliant, legally correct, and defensible work products. While we are not a law firm and therefore cannot provide legal advice on these legal policies, our deliverables are "camera ready" in that any legal review will generate minimal or most often no changes. Typically, a client's in-house counsel reviews the policies and other deliverables.

Legal and regulatory research

Contoural maintains a proprietary citations database with over 350,000 entries, encompassing state, provincial, and federal regulations across more than 165 countries. Each citation is carefully validated for accuracy and reliability. The database is regularly updated to reflect changes in legal requirements.

Policy and schedule ongoing updates

A records retention schedule or data retention policy is a living framework that must evolve as your organization and the regulatory landscape change. New record types emerge, legacy records become obsolete, legal citations are updated, and new recordkeeping and privacy laws take effect, all of which require thoughtful review to avoid creating unintended risk.

We perform ongoing, regular updates reflecting legal and regulatory changes and new information types through records retention policy and schedule refresh and update.

We recommend that schedules be refreshed every 12 to 18 months, accounting for:

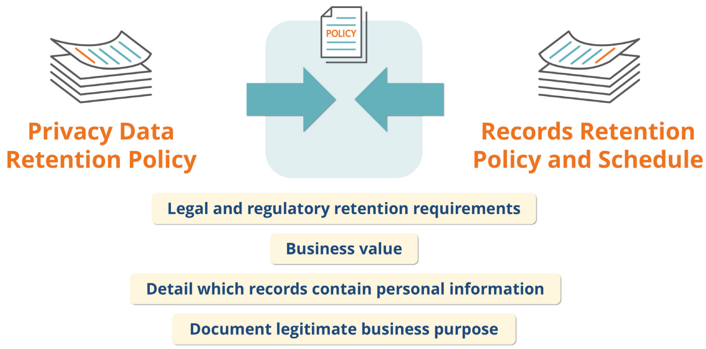
- New and revised legal and regulatory requirements
- Emerging privacy obligations
- Newly created or received record categories (including personal information)
- Records that are no longer generated
- Changes in business value, adjusting retention upward or downward based on business usage

We also reassess retention periods based on current business value and operational needs and ensure records retention training and procedures reflect the new retention requirements.

Schedule privacy enablement

Global records retention requirements establish minimum retention periods based on legal and regulatory obligations. At the same time, privacy laws and data protection frameworks increasingly require that personal information be retained only as long as necessary to fulfill a legitimate business purpose. These two regimes can conflict if not thoughtfully aligned.

Rather than maintaining separate and potentially inconsistent records retention schedules and privacy data minimization policies, organizations should "privacy enable" their retention schedules. This means integrating privacy principles directly into the schedule itself, creating a single, harmonized governance framework that satisfies both recordkeeping obligations and data minimization requirements.



Privacy enablement strengthens defensibility, reduces regulatory risk, and ensures the organization can clearly articulate why personal information is retained and when it will be deleted.

Information types inventory

We conduct a comprehensive inventory of information types that reflects how the business actually creates and manages information and serves as a foundation for further work. The inventory serves as the foundation for records retention schedules, defensible disposition programs, privacy compliance alignment, data minimization initiatives, and broader information governance strategy.

M365 Records Portal

Leveraging native Microsoft 365 capabilities, we design and deploy a browser-accessible, fully searchable online records retention schedule. Built using Microsoft Power Apps and existing M365 functionality, the solution delivers a modern, user-friendly interface for viewing retention policies, schedules, legal citations, and related governance information without requiring the purchase of additional software.

Key features include:

- ***Records retention policy and schedule management***: Publishes records retention policies and schedules, ensuring employees always have access to the most up-to-date information.
- ***Customizable views***: Allows fully customizable views of records retention schedules. Users can filter and display records based on department, group, region, or other criteria.
- ***Advanced search capability***: Includes robust search functionality to quickly locate records and policies.
- ***Legal and regulatory citation integration***: Can link retention schedules to legal and regulatory citations for compliance purposes.
- ***Web-based access***: Accessible via any standard browser, ensuring ease of use.
- ***Change tracking***: Journals all changes to schedules, allowing users to view records requirements at any specific point in time.
- ***Effortless updates***: Enables quick and easy updates to retention schedules.
- ***Administrative control:*** Designated administrators have full control over updates and access permissions.

The M365 Records Portal is not an additional product but a configuration of M365 itself. No connectors, third-party tools, or additional M365 features are required. The portal uses the inherent security and access controls of M365, eliminating the need for additional measures.

TRUSTED BY
30%
OF THE FORTUNE 500

PROGRAMS IMPLEMENTED IN
150+
COUNTRIES

INDEPENDENT CONSULTANTS WITH
26
AVERAGE YEARS OF EXPERIENCE

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.

ASSESSMENT AND STRATEGY	RECORDS MANAGEMENT	PROCESSES AND GOVERNANCE	EXECUTION, AUTOMATION, AND TRAINING	REFRESH, AUDIT, AND STAFFING
Maturity assessment and strategic roadmap	Records retention policy and schedule (data retention policy)	Data security classification	Data placement and automation	Ongoing policies refresh
		Privacy program		
		AI readiness	Behavior change management and training	Program audit
		Governance processes and procedures		
		M&A unstructured data integration	Document and data disposition	Fractional and transitional staffing
		Discovery response and legal hold		
INFORMATION GOVERNANCE ORGANIZATIONAL DEVELOPMENT				

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

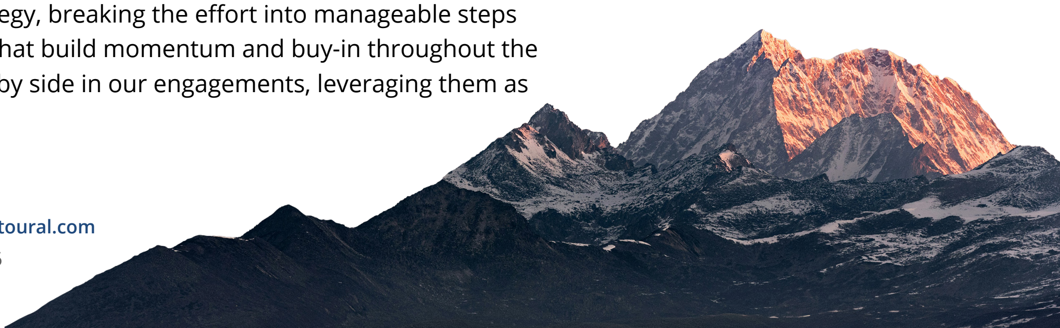
Having developed programs for information governance operations in 150+ countries, we understand local requirements and can integrate these into a global program.

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:

650-390-0800 | info@contoural.com | www.contoural.com