Retention Implementation Across Structured and Unstructured Systems

Date & Time: May 6, 2026 | 10:10 – 11:10 AM

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Speakers

Wanne Pemmelaar

CEO / Co-founder, filerskeepers and Lawstronaut

Wanne is a top-tier data & tech lawyer and 3x entrepreneur who loves building tech solutions to legal problems he has experienced firsthand. Wanne has over a decade of work experience as a legal practitioner. When it comes to developing products, he insists on stellar design and a commitment to user empathy.

Jordan Uytterhagen

Founder & CEO, Cadence Solutions

Jordan Uytterhagen is the Founder and CEO of Cadence Solutions, a leading Microsoft partner specializing in Microsoft 365, SharePoint, and Purview. With over 20 years of experience in information management, Jordan's career was shaped by witnessing a failed ECM implementation, an experience that inspired him to launch Cadence in 2013 with a client-first mindset.

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The New Reality of Data

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The “pledge” of AI

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Data itself has little value

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It is the use of data
that determines their value

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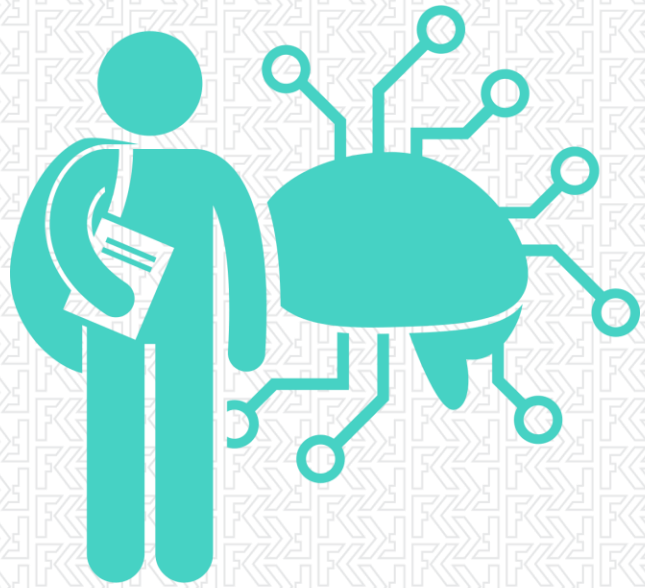
RIM Becomes Mission-Critical in the Age of AI

- AI and ML depend on:
  - Clean
  - Classified
  - Structured
  - Governed
  - Trustworthy

  …data.



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What are we trying to accomplish?

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“Data Governance”

1

What?

What data do I have?

Where?

Where is the data located?

2

4

How?

How do people find and use the data?

Who?

Who owns the data?
Who has access to the data?

3

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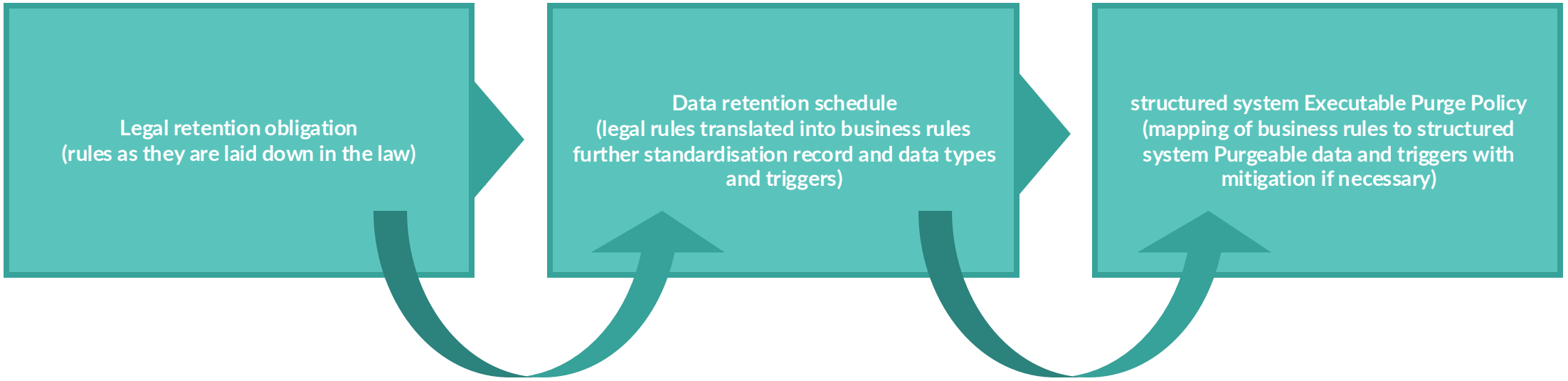
Schematic end to end solution



This translation, mapping and standardisation is a legal exercise

This translation and mapping, adjusting of triggers is a legal and technical exercise

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Building the end-to-end examples of translations of triggers and retention periods

Legal rules to business rules

Example - Law says: 10 years from the date the injured party became aware of the damages.
Business rule becomes: 10 years from the date of termination of the employment agreement.

From Business Rule to structured system Purge Policy

Example – Business Rule says: 10 years from the date on which the fiscal year ends. structured system Purge Policy will say: 11 years from the date of creation

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Prioritisation

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To prioritize or not to prioritize?

- **Tackling only the top systems:**
  - Most companies know their biggest risks
  - Usually: HRIS/HRM, ERP, CRM and Office suite

- **Tackling the entire system landscape:**
  - Where to go you have fixed the material systems?
  - You need to score your IT landscape!

- **Alternatively, tackling by business function/department:**
  - Fix HR first, then Finance, then Sales etc

Whatever you do, don't promise your leadership you will solve all their problems at once.

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Prioritization of Systems

- Goal: making smart choices with regards implementing the schedule
- You cannot solve all issues at once!
  - **Assess Importance & Risk:** Systems scored on data volume, sensitivity, regulatory significance, retention risk, and business criticality.
  - **Criteria for Scoring:** Include data type (personal, financial, health), compliance requirements, and operational role.
  - **Scoring Mechanisms:** Consider global vs local, cloud vs on-premise, structured vs unstructured data, and current vs legacy systems.
  - **Weighted Scores:** Assign weightings based on criteria importance, calculate scores to reflect system alignment with retention needs.
  - **Rank & Plan:** Use scores to rank systems by priority. High-level planning includes project team size, stakeholder involvement, tooling options, project timelines, and success conditions.
  - **Validation:** optionally engage stakeholders to validate and adjust scoring and planning based on operational realities.

Objective: This structured approach ensures that high-priority systems with critical or sensitive records are addressed first, optimizing resource allocation and enhancing compliance.

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Structured Systems

Implementing Retention Schedule

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Implementation of retention schedule into structured systems

- Goal: executable policy for data purge in structured system
- Deliver executable policy for data purge in structured system with input to global schedule including:
  - Determining frequency to execute
  - Defining filters to apply to data (e.g. worker type, company, country, etc)
  - Providing legal retention obligations to be executed
  - Mapping the retention obligations to data objects to include in execution
- Process to check data purged
- Test and validate the structured system data purge policy using data retention obligations and mitigate residual risk/make adjustments
- Execute structured system data purge policy using data retention obligations
- Brief description on the structured system data purge policy, risks and agreed process (included in structured system data purge policy file)

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The three issues when mapping to a structured system

- **Scope differences between schedule and system**
  - Example: the law makes a distinction between regular leave and sick leave.
  - Tools like Workday groups these two and calls it absence.
- **Data dependency**
  - We want to delete data A but we cannot delete data A without deleting A and B.
  - A and B have different retention periods
- **Limited triggers available within the system**
  - The laws says e.g. end of fiscal year
  - E.g. Workday only allows for termination date for terminees

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Targeting structured data (step by step)

Goal: executable policy for data purge in structured system

Step 1: Understand how the structured system is currently used (outcome: high level understanding of the use of the system within Sony) [Discovery]

- Which modules/subproducts are used
- What are the important source systems (if any), what are the downstream systems
- Where is the system used
- By whom is the system used
- Discuss what the archiving and purging capabilities of the system are
- Gain insights in data volumes and what kind of deletion loads would impact the performance of structured system (if necessary involve structured system for this)

Step 2: Get insight into the the structured system data model and purgeable data model (outcome: detailed understanding of the system and the purposes for which data are used)

- Delivery of structured system data model and structured system purgeable data model in Excel, specified by what is actually in use by Sony
- Review by filerskeepers
- We would like one or more workshops with subject matter experts to:
    - get a narrative on the data models
    - Understand what if the data model and the purging data models are the same or different
    - Understand data retention triggers (the moment the retention period starts running)

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Targeting structured data (step by step)

Step 3: Go over a Sony data retention schedule (outcome: understanding of the retention decisions made by Sony)

- Delivery of Sony data retention schedule (to create a uniform HR data retention standard within regardless of structured system)
- One or more workshops with subject matter experts to give a narrative on the Sony data retention schedule and receive feedback

Step 4: Draft executable the structured system purge policy [Mapping & Report]

- Deliver executable policy for data purge in the structured system with input including:
  - Determining frequency to execute
  - Defining filters to apply to data (e.g. worker type, company, country, etc)
  - Providing legal retention obligations to be executed
  - Mapping the retention obligations to data objects to include in execution
- Process to check data purged
- Receive feedback from Sony subject matter experts and Legal on our draft report and purge plan.

Step 5: Test, validate and mitigate residual risk

- Test and validate the outcomes for executable the structured system purge policy
- Identify and mitigate residual practical risks and finalize document containing the end-to-end solution

Step 6: Update and finalize the structured system purge policy following input from Sony

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Purge plan

The Purge Plan are filters to be set within e.g. Workday to create reports of data which can be purged. They are grouped by record types in the schedule and by retention period. Deviations need a separate report within the filters.

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Purge Plan	Area / Purgeable Data Type	Description	Ref. No.	Retention Period	Geo scope
Purge Plan - HR01 - HR-Financial - GS	Compensation	Merit statements and merit, bonus, and stock notes.	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Compensation - Additional Compensation	Merit statements and merit, bonus, and stock notes.	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Compensation - Core		HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Compensation - Merit Statements, and M	Merit statements and merit, bonus, and stock notes.	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	Worker's External Payslip Attachment and Comment	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	(DO NOT USE) Attachments for Worker's External Pa	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	Worker's External Tax Document Attachment and Com	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	Worker's External Payroll Document uploaded as "Oth	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	Worker's External Payroll Input Comment	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Payroll	Payment Elections for Worker	HR01	15 years	All except Bulgaria, Chile and Vietnam
Purge Plan - HR01 - HR-Financial - GS	Custom Object	Worker - End Date 30% Ruling	HR01	15 years	All except Bulgaria, Chile and Vietnam

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Unstructured Systems

Implementing Retention Schedule

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The challenge of email

- Email is a means of a communication not a record
- Technically one should do massive manual/automatic labelling or data discovery
- Most companies:
  - are not yet ready for data discovery on email
  - Implement blanket retention periods ranging from 6 months to 10 years on average
- Don’t forget commercial correspondence laws! In some countries you need to keep emails very long
- Commercial correspondence: two interpretations
  - Broad: anyone can create obligations for the organization
  - Narrow: only those who the power to represent the organization
- By role/function?

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The challenges of unstructured systems

- Unstructured systems (e.g., emails, shared drives) lack organization, complicating retention schedule implementation.
- Key Technical Challenges:
  - Data Discovery: Scattered data is hard to locate and classify.
  - Inconsistent Metadata: Lacks uniform tags for retention rules.
  - Fragmented Storage: Data across multiple platforms hinders management.
  - Oversight Risk: Unstructured data may be missed, risking non-compliance.
  - Complex Deletion: Securely erasing data from diverse sources is difficult.
- Key Organizational Challenges:
  - Insufficient leadership buy-in
  - Records management and defensible disposal policies non-existent or not working
  - Legacy problem: Sharepoints and Team sites not properly designed

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Companies have two problems

- A legacy problem
  - ”We created a mess of our Sharepoints/Teams’ sites etc”
- A future-facing problem
  - ”How do we make sure we do not end up in the same mess again in a few years?”

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Unstructured Data

The gap between tools, behavior, and control

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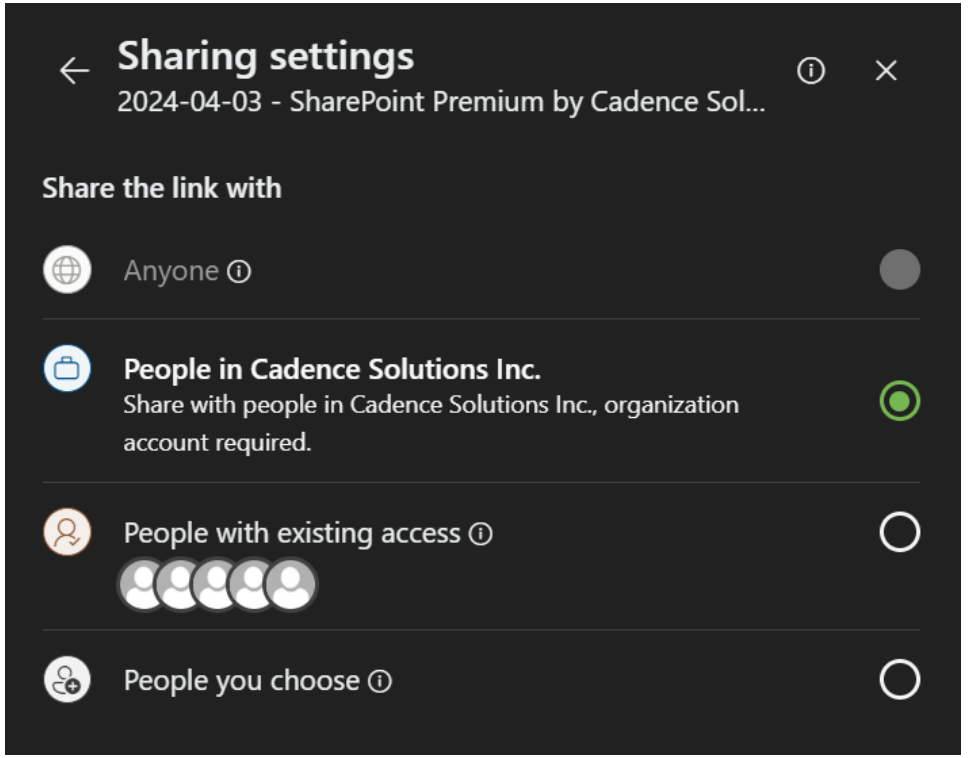
One specific scenario - Sharing

1. **Anyone**
   These links let anyone access files and folders without signing in.

2. **People in the organization**
   These links can be forwarded internally and let anyone in the organization access files and folders.

3. **People you choose**
   Links were created for people outside the organization.



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One specific scenario - Sharing

	Role	Desired Access
 Johnny	Creator/Owner	✓
 Mary	Contributor	✓
 Sally	Irrelevant	✗

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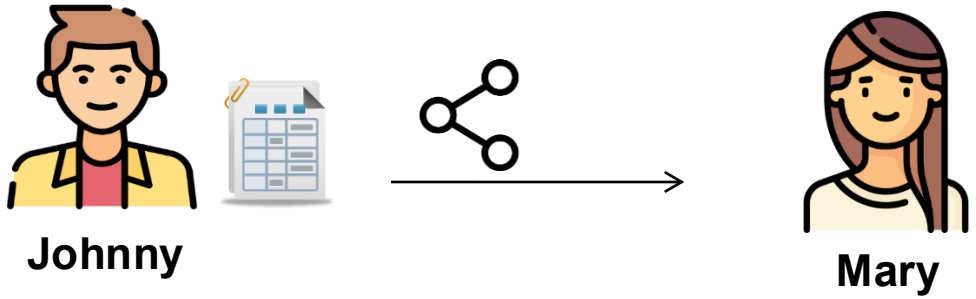
One specific scenario - Sharing



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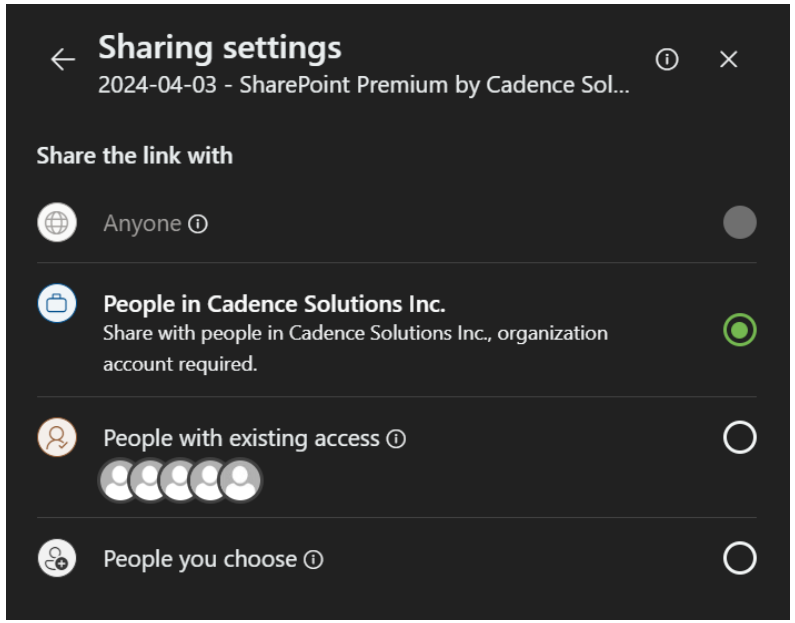

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One specific scenario - Sharing

	Role	Desired Access	Have Access
 Johnny	Creator/Owner	✓	✓
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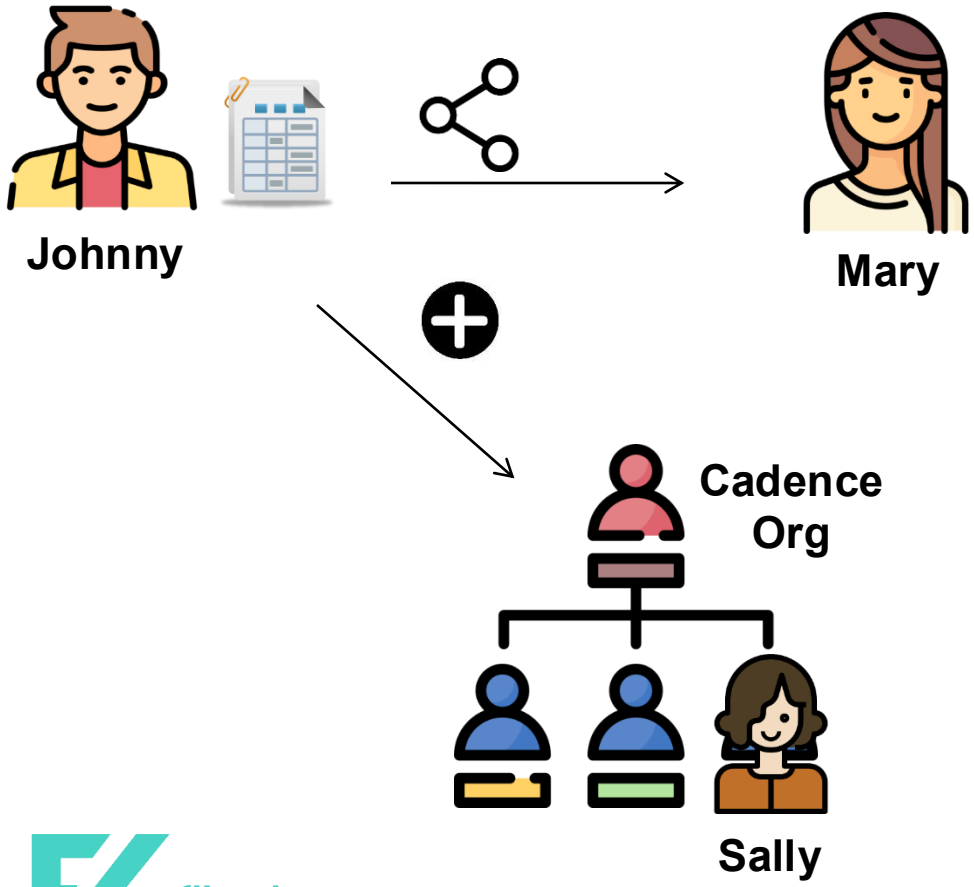
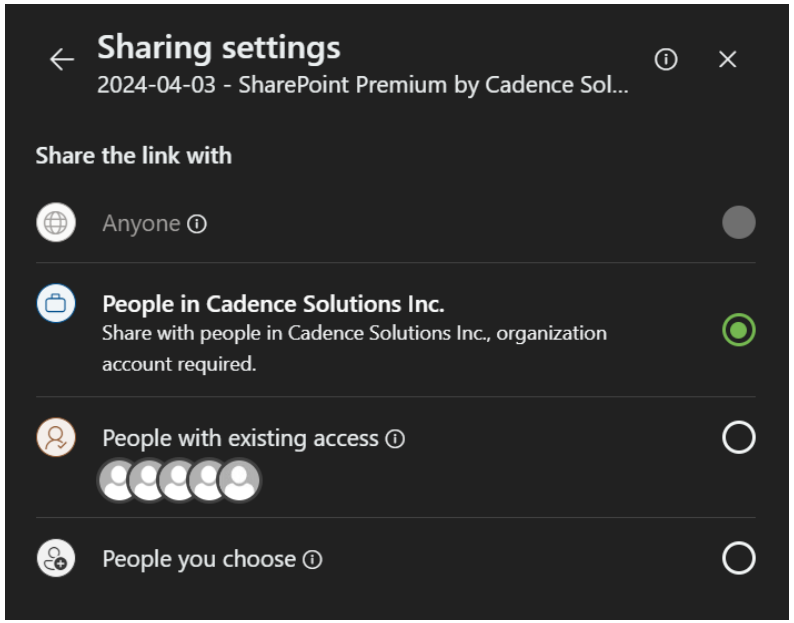
One specific scenario - Sharing





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One specific scenario - Sharing

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One specific scenario - Sharing

Security through Obscurity
The concept of security through obscurity relies on the **idea** that a system can remain secure if the vulnerabilities are **secret or hidden.**

Copilot

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Structured Systems

Executing Retention in Systems and Workflows

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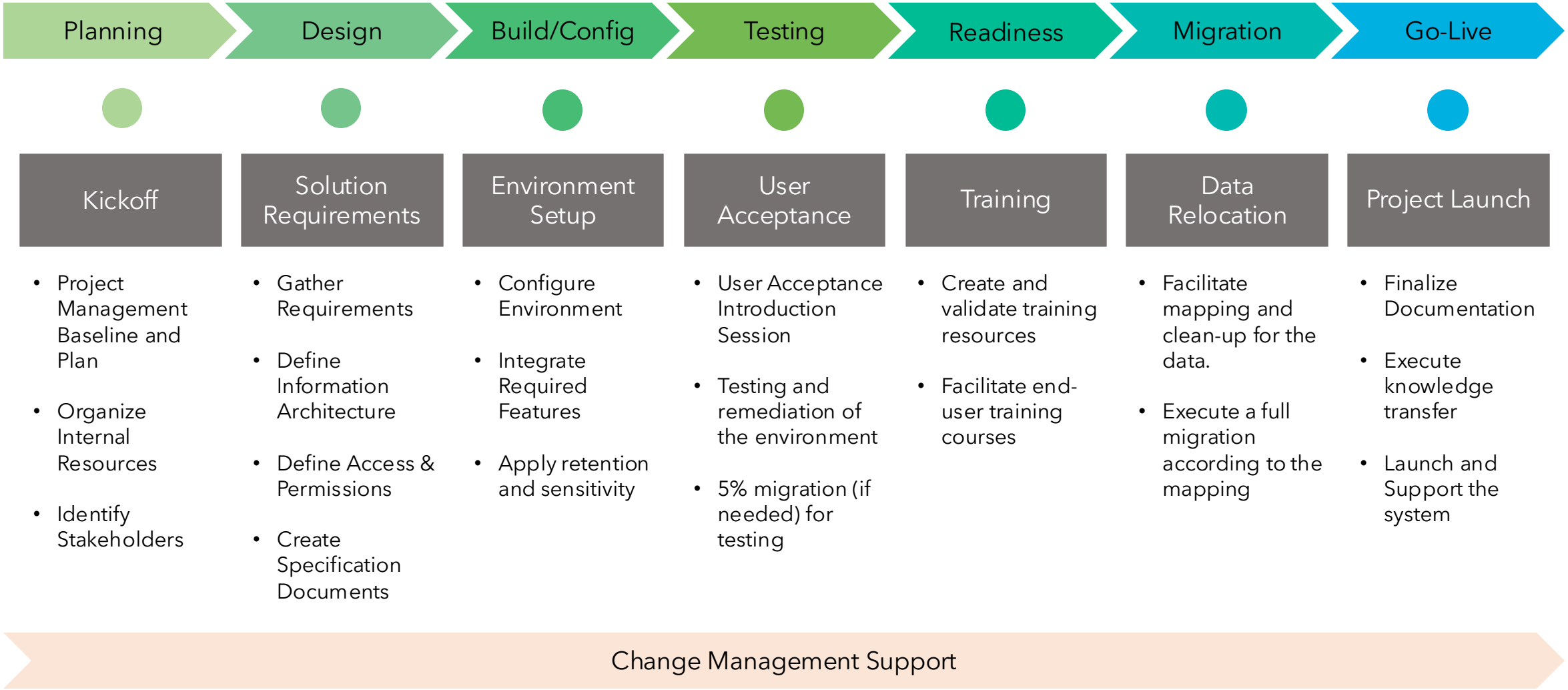
Project Approach Overview

Overview of Cadence's approach to a project's life cycle



Implementing Purview for Retention

- Records Management in Purview is the built-in, Microsoft native solution for defensible, schedule-based Records Management
- Retention Labels are attached as metadata to a record in SharePoint, Exchange, Teams, and/or OneDrive
- Each label can contain a schedule dictating when the record should be disposed of
- Other features are included, such as locking and deletion protection
- A label can trigger a review and approval workflow before an item is deleted from the environment

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Implementing Purview for Retention

- Records Management starts by creating labels in the File Plan
- For those of you with a Records Retention Schedule, the immediate assumption is to create one label per category, but this is not necessarily true
  - Each label needs to be a combination of record category and approver, otherwise approval will be unclear
  - This rapidly expands the number of labels you will have – the Import function helps
- Once labels are available, we publish labels using policies to the different areas of M365
- After items are labelled, they start to appear in disposition when the schedules expire

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Operationalising Retention in Systems

Governance

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What makes a retention schedule “Purview-ready”?

- **Golden Standard Labels**
  Harmonized global record categories to stay within Purview’s 1,000 label limit
- **Jurisdiction as Logic, Not Labels**
  Local legal variation applied through rules, not duplicated label sets
- **Clear Retention Triggers**
  Defined, system-detectable events (e.g., termination, contract end)
- **Defensible Legal Mapping**
  Each label backed by auditable legal research across jurisdictions
- **Implementation-Ready Design**
  Structured taxonomy, naming, and metadata aligned to M365/Purview

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Operationalising Retention in Systems

System integration

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Getting ready for Copilot

Recommended Steps

SharePoint, OneDrive, Office Apps

Content management governance

Archive/Delete old and inactive content to improve Copilot accuracy and remove obsolete information while securing content that needs to be retained.	Generate visibility and reports on files and sites that may be overshared and implement remediation steps in combination with an access review process.	Restrict access or limit scope of search and copilot to meet organizational requirements and organizational risk tolerance.

Data security and compliance path

Establish data retention and deletion policies, classification, and sensitivity labels for sensitive content.	Apply retention labels for deletion of old data and records.	Apply sensitivity labels to documents, document libraries, and auto label intellectual property.	Apply protection on sensitive data with encryption and DLP policies to prevent data leakage.

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Defensible Deletion

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Data deletion as the ultimate sign of trust

- Deletion is the ultimate sign of data protection and trust
- You are able to put the interest of the individual above yours
- This can increase trust of up to 50%!
- Deletion is very scary

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The challenge true deletion

True compliant deletion is:

- Irreversible
- Auditable

True compliant anonymization is:

- Irreversible
- Auditable

Ever thought of synthetic data?

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Starting with the exceptions: Legal Holds

- **Are you in control of your Legal Holds?**
  - Do you have a Legal Hold tool?
  - Do you have a full inventory of your Legal Holds
  - Do you know all custodians?
  - Have you lifted all legacy holds?

- **The challenge of active Legal Holds:**
  - Do they expand across departments?
  - Do they apply internationally?

- **Side step: do you keep boxes with incomplete inventory b/c they may fall under a Legal Hold?**

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The Future of Retention

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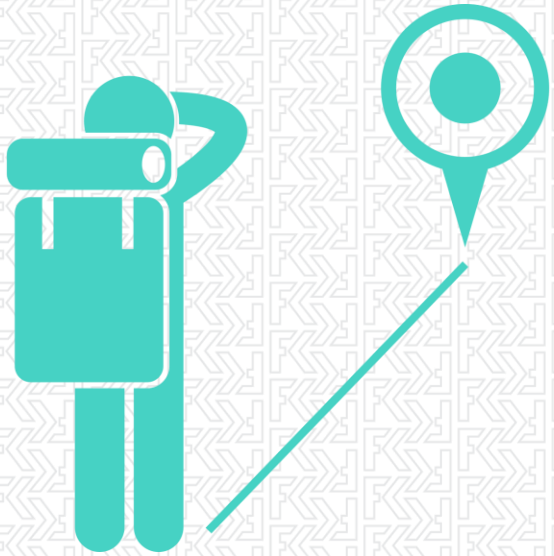
Data Lineage = The Path

- Technical, system-focused, answers questions like:
  - Where did this data come from (which system)?
  - What ETL/transformations did it undergo?
  - Which reports, dashboards, or pipelines use it?
- Use cases:
  - Debugging bad reports
  - Impact analysis for changes
  - System migrations
  - Regulatory mapping (at a surface level)
- It's like parcel tracking: you see every hop, warehouse and truck.



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Provenance = The Story

- Archival / records-management concept, focused on origin, custody, context, and purpose:
  - Who created this information, under what authority?
  - Why was it created? For which business function or decision?
  - When and where was it created and used?
  - Who has held it? Has the chain of custody been secure?
  - What is its relationship to other records from the same creator?

It's like legal chain of custody + biography:
who sent it, why, what's inside, and proof it wasn't tampered with.

- Advantages
  - Wider scope
  - Richer Context
  - Deeper Trust (Authenticity and Reliability
  - Long-Term value

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Defining Provenance

- Provenance is structured, contextual, and legally meaningful information. It captures:
  - Origin: Who created it, and under what authority?
  - Purpose: Why was it created (business process context)?
  - Context: What other records or events is it related to?
  - Custody: Who has handled it (access, transfer, modification)?
  - Integrity: Has it remained unchanged?
  - Meaning: What does it represent (its evidential status)?
- Current Reality: Most organizations today capture almost none of this automatically.

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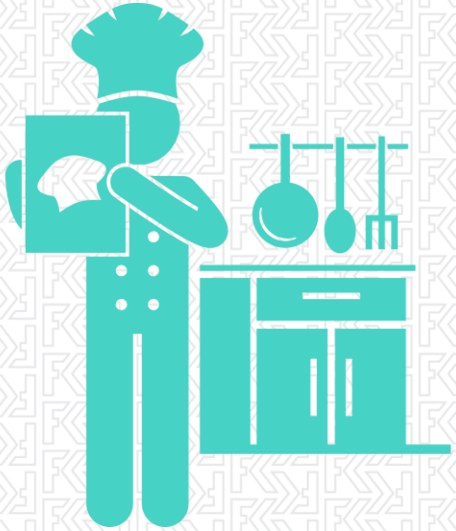
What is Ontology?

- An ontology is not a metadata schema.
- It is a conceptual model of your organisation.
- It tells machines:
  - What things are
  - How they relate
  - What rules govern them
  - Why they exist
- File Plan = A static map
- Ontology = GPS + satellites + real-time traffic



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The Knowledge Graph

- Ontology becomes powerful when activated as a knowledge graph.
- It lets the organisation:
  - Classify automatically
  - Apply retention automatically
  - Trigger legal holds automatically
  - Connect records, events, people, and processes
  - Surface insight across silos
- This is RIM on a whole new level.

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The Human–Machine Bridge

- Records must be human-readable AND machine-readable.
- Ontology is the translation layer.
- AI needs context.
- Ontology tells systems what a record IS and WHY it exists.

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The Knowledge Graph

- AI cannot “guess” the full meaning of a record.
- But with ontology, systems can understand:
  - This is a contract
  - Created by Legal
  - Related to Vendor X
  - Governed by policy FIN-POL-007
  - Under a litigation hold
  - Connected to invoice #12345
- Machines need context. Ontology gives it to them.

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Let’s hear from you

Please drop your questions in the Q&A section.

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Thank You!

Contact filerskeepers

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