



# Information Lifecycle Management

Secret Sauce for Disposing of  
Non-Records

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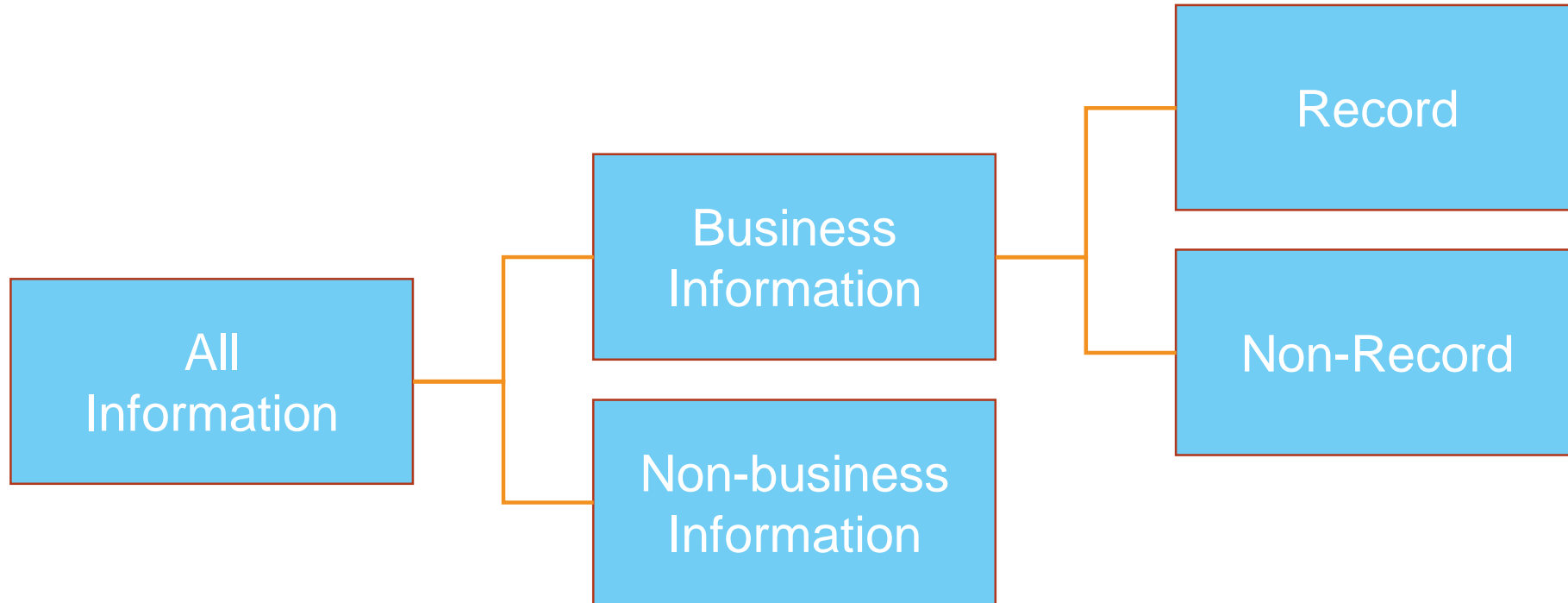
# Agenda

- Review information lifecycle basics
- Information Lifecycle Model and the Secret Sauce
- How to use the ILM to define retention for non-record information
- Practice case
- Discuss going-forward strategy

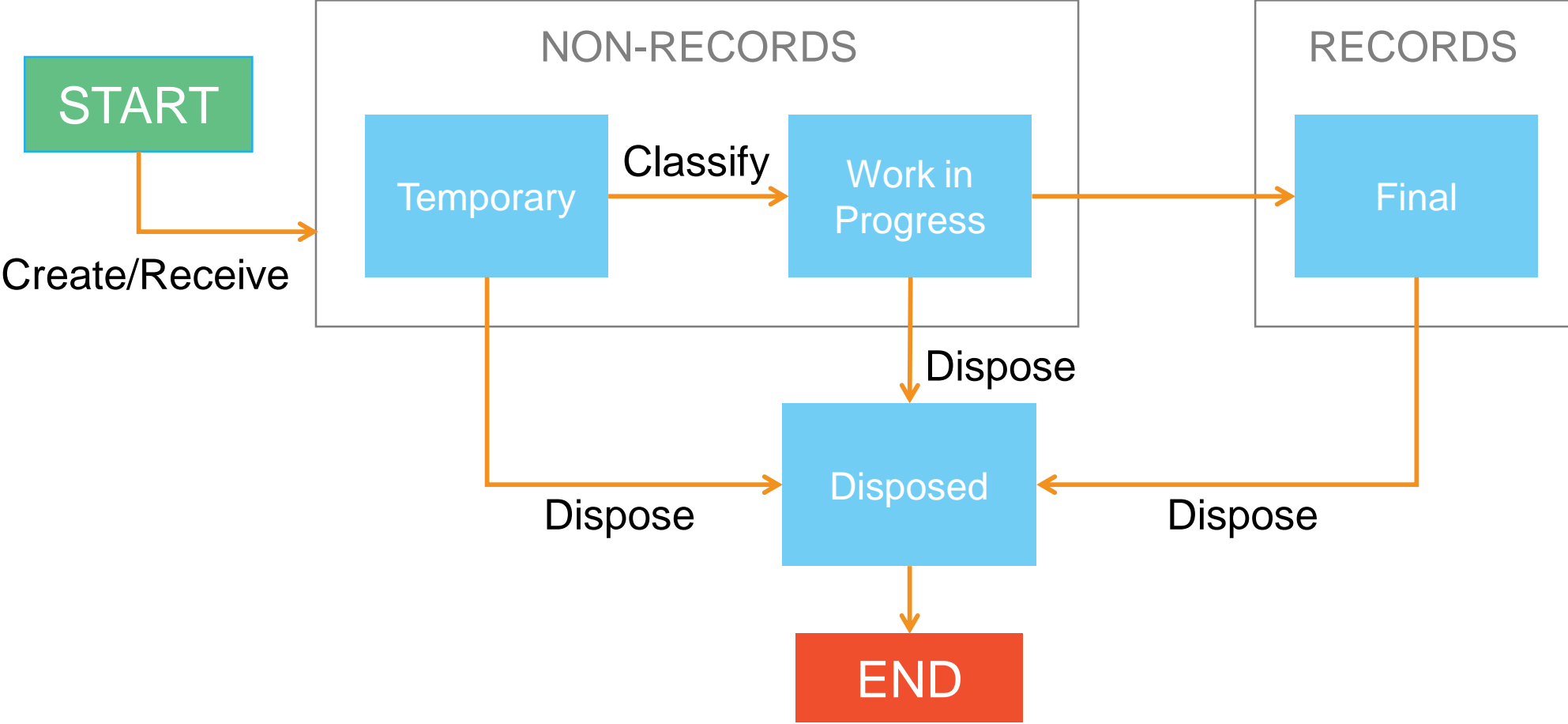
# The Basics

- All information can be categorized into 'types'
- Each information type has a different 'value'
- Value is based on importance to the organization
- Definition of retention rules varies based on information type/value

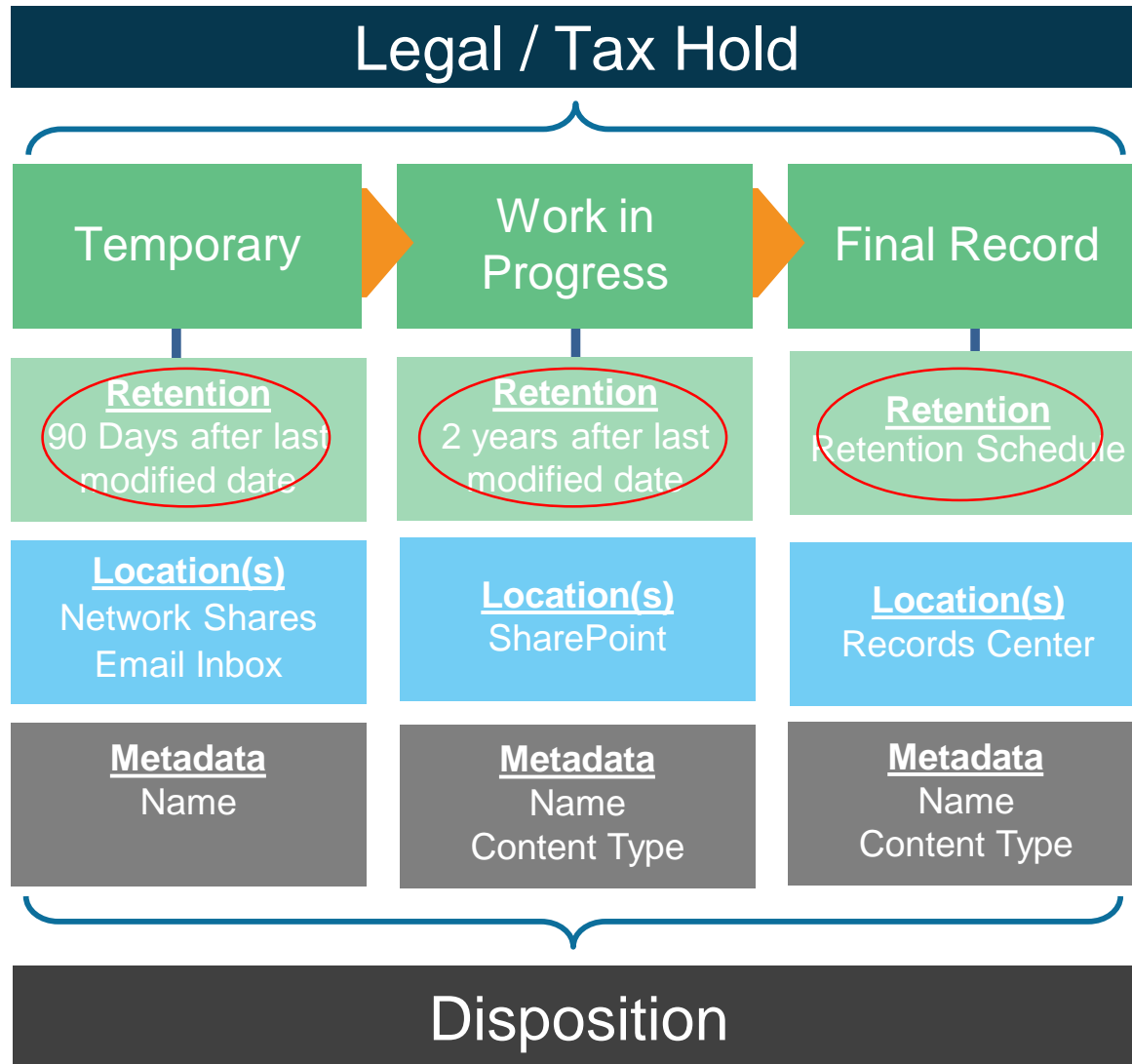
# Information Type Model



# Information Lifecycle Model



# Business Rules for Non-Records [Secret Sauce]



- Location(s)
- Metadata
- Personal information protection
- Retention / Disposition
- Security classification

# ILM for Data Analytics / Big Data

To demonstrate how to define retention for non records, chose a challenging problem – establishing retention for data analytics/big data

- Need to consider multiple stakeholder points of view:
  - Business owners of the data
  - Accounting and Finance
  - IT
  - HR
  - Legal / Compliance
- Negotiate to a reasonable retention

# Case Study #1 Data Analytics / Big Data

## Apparel Manufacturing Company

Record Series Code	Record Series Name	Record Series Description	Record Types	US Baseline Retention Period
MKT012	Business Analytics	Records resulting from analysis of internal and external trend data. Includes account presentations of business analytics.		5 years
MKT012			Monthly Syndicated Marketing Report	
MKT012			Marketing Mix Analysis	
MKT012			Strategic and Trend Services Analysis	
MKT012			Weekly Corporate Report Summarizing Point of Sale (POS) Data	



# Case Study #2 Data Analytics / Big Data

## History Snapshot – July 2015

Down to 59 “Information Categories”, New Name: “CIRS”

Corporate Information Retention Schedule  
Zions Bancorporation

July 31, 2015

Retention Code	Information Category	Information Category Description	Retention Period (Years)	Retention Period (Months)	Retention Start
1000	Administrative / General	Information with temporary business value including work-in-progress, records not in final form, convenience copies and notes not classified as a record under retention codes 3000-8000. Retention period determined by business unit based on business need, but recommended not to exceed three years-from date created. <u>Examples:</u> Non-board committee records, management reports, ad-hoc business system reports, agendas, presentations, minutes, informational research, general correspondence, community outreach / service, advisory boards, user groups, steering committees, deposit verification, credit inquiries, customer financial statements, transportation, mail / courier services, logs, draft documents, branch internal control and accountability reporting system (ICARS). <u>Note:</u> Information retained in this category is not considered a record of the company, but must be retrievable and accessible in support of legal hold and discovery when applicable.	0	0	Creation
2000	Reference & Reporting Data	Transactional information collected from multiple business system sources with long-term business value supporting business intelligence, business trend analysis, strategic planning and regulatory reporting/stress testing. <u>Examples:</u> Data collected in repositories such as the Enterprise Data Warehouse, Hadoop, and line-of-business specific data bases used for modeling or to facilitate compliance with Basel. <u>Note:</u> Information retained in this category is not considered a record of the company, but must be retrievable and accessible in support of legal hold and discovery when applicable. Wherever possible, customer specific information should be scrubbed from these databases/repositories.	IND	IND	Creation
3000	Corporate Records	Organizational, board, stockholder, intellectual property and brand / trademark records of the Bancorporation, its affiliates and subsidiaries. <u>Examples:</u> Corporate charter, articles of incorporation, bylaws, board of directors, capital stock, common and preferred stock, earnings, dividends, proxy, stock options, copyrights, annual reports, audited financial statements.	IND	IND	N/A
3010	Corporate Transactions / Filings	Records of all corporate transactions and filings pursuant to federal securities law including acquisitions, mergers, sales, other ownership / stock transactions, and SEC filings / correspondence. <u>Examples:</u> Original agreements, regulatory applications, and approvals (from senior management, stock holders, SEC), due diligence, financial information for companies being acquired or sold, board presentations, board approvals, sales agreements, representation letters, closing documents, joint ventures, commercial transactions, Securities and Exchange Commission (SEC), 11K (benefit plan filing), forms S1, S2, S3, S4, forms 8, 8A, 10K, 10Q, 8K, 12B-25 (Late Filing), Schedule 14A; forms 3, 4, 5 (disclosures of executives and officers and principals shareholders), officer / director questionnaires detailing their holdings of Zions Bancorporation Stock, outside positions and relevant transactions.	10	120	Completion, Termination or Filings



## Exercise: Define Retention for Lifecycle States

Who are the stakeholders for data analytics / big data? What are their points of view?

- Business owners
- Accounting / Finance
- IT
- HR
- Legal / Compliance
- Other?

## Develop an Action Plan for Applying the ILM Model to Non-Records Information in a System

- Formalize by embedding ILM model in policies, procedures, and training
- Implement in conjunction with a migration to Office 365 for example
- Address legacy content before migrating including non records / Redundant, Obsolete, and Trivial (ROT) including records with expired retention periods
- Change management

## Monitor Implementation of the ILM Model and Plan for Sustainability

- Identify, monitor, and report metrics (manual or automated)
  - New information entered
  - Information disposed / deleted
  - Information on legal or tax hold
  - Training on ILM model
  - Number of systems in which ILM is applied
- Partner with Internal Audit to monitor for compliance



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