

# ***Buckets, Functions, Content Types – Oh My!***

***New Ways to Rethink Your Retention Schedule***



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# Our Speaker



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John Isaza is co-founder and Chief Operating Officer at Lexshift, LLC, featuring the mosalQ suite of products for retention schedule management and auto-classification of records. He also founded Isaza Law, an AI-native law firm focusing on records and information management, information governance, privacy and AI. Prior to that, John was a Partner at Rimmon Law, heading the Privacy, Records and Information Governance practice out of Boston. He is the co-founder of Information Governance Solutions (IGS) featuring Virgo™, a cloud-based software for records information management and global research, sold to Access Corp in January of 2020. Mr. Isaza is a world expert in the field of privacy and information governance. He has developed global privacy, information governance and records retention programs for some of the most highly regulated Global 1000 companies. He is co-author of 7 Reasonable Steps for Legal Holds, 7 Steps for Legal Holds of ESI & Other Documents, Internet Law for the Business Lawyer, 2nd Edition, and Handbook on Global Social Media Law for Business Lawyers. He is past co-Chair of the American Bar's Social Media Subcommittee as well as the Consumer Privacy and Data Analytics Subcommittee, past Chair of the IGP Certification Board, and a Fellow of ARMA International.

# Agenda

**Historical Approaches to Retention Schedules**

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**Current RRS Best Practices**

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**Ways to Future Proof the RRS**

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**Q & A**

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# Part 1

## Historical Approaches to RRS



# *Historical Approaches*



- Departmental retention schedules
- Functional retention schedules
- Big Buckets
- Excel spreadsheet exchanges
- Cloud-based RRS management

# *Why Is RRS the First Line of Defense?*

- 🎯 Legal Holds
- 🎯 Privacy Compliance
- 🎯 ROT Disposition



# Part 2

## Current Best Practices to RRS



# Information Lifecycle Management Website Support

## Information Lifecycle Management



Policy



Retention  
Schedule



Litigation  
Holds

**OTY**

Open Tax  
Year



Training



RIM

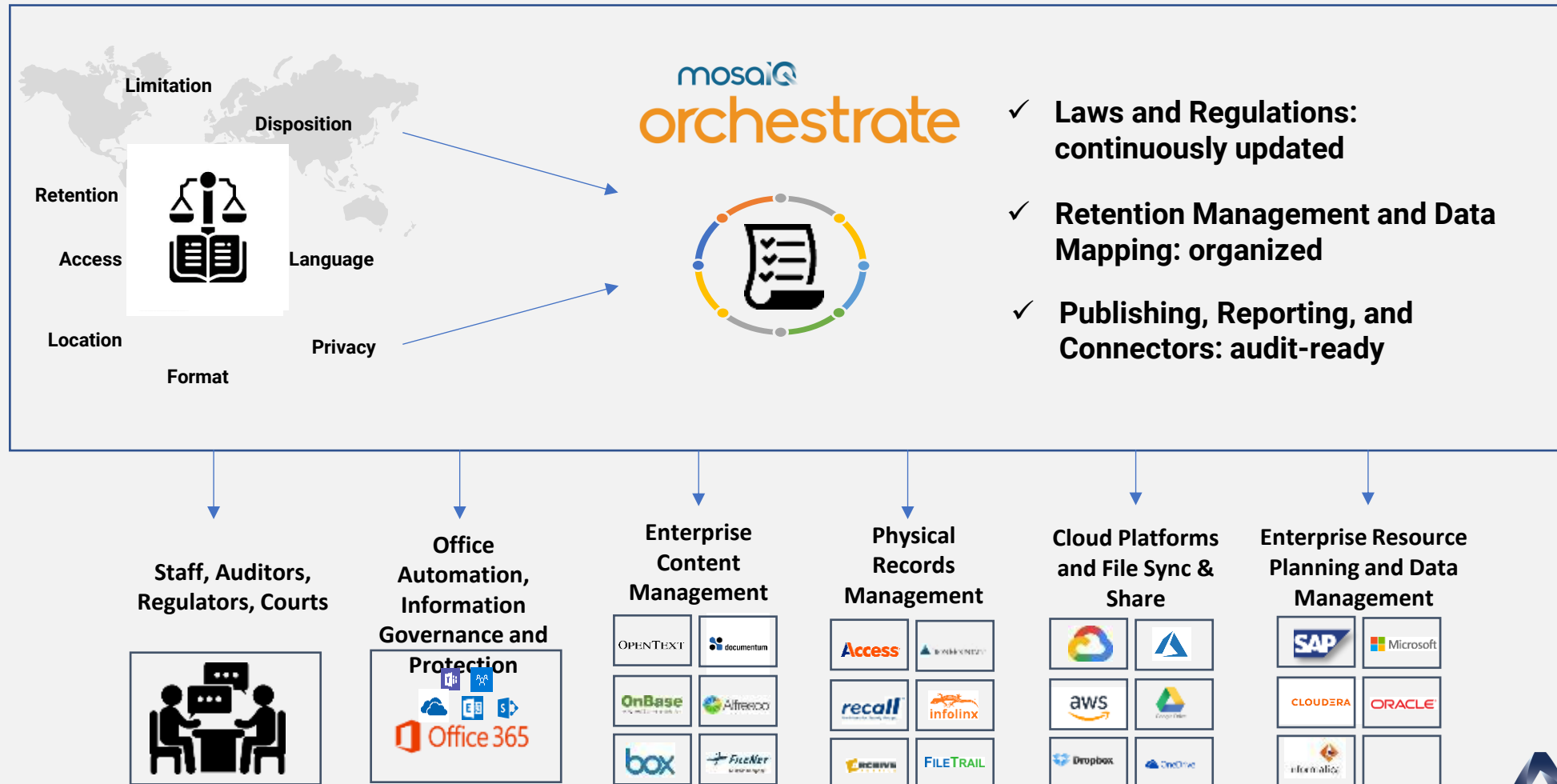


Tool Box

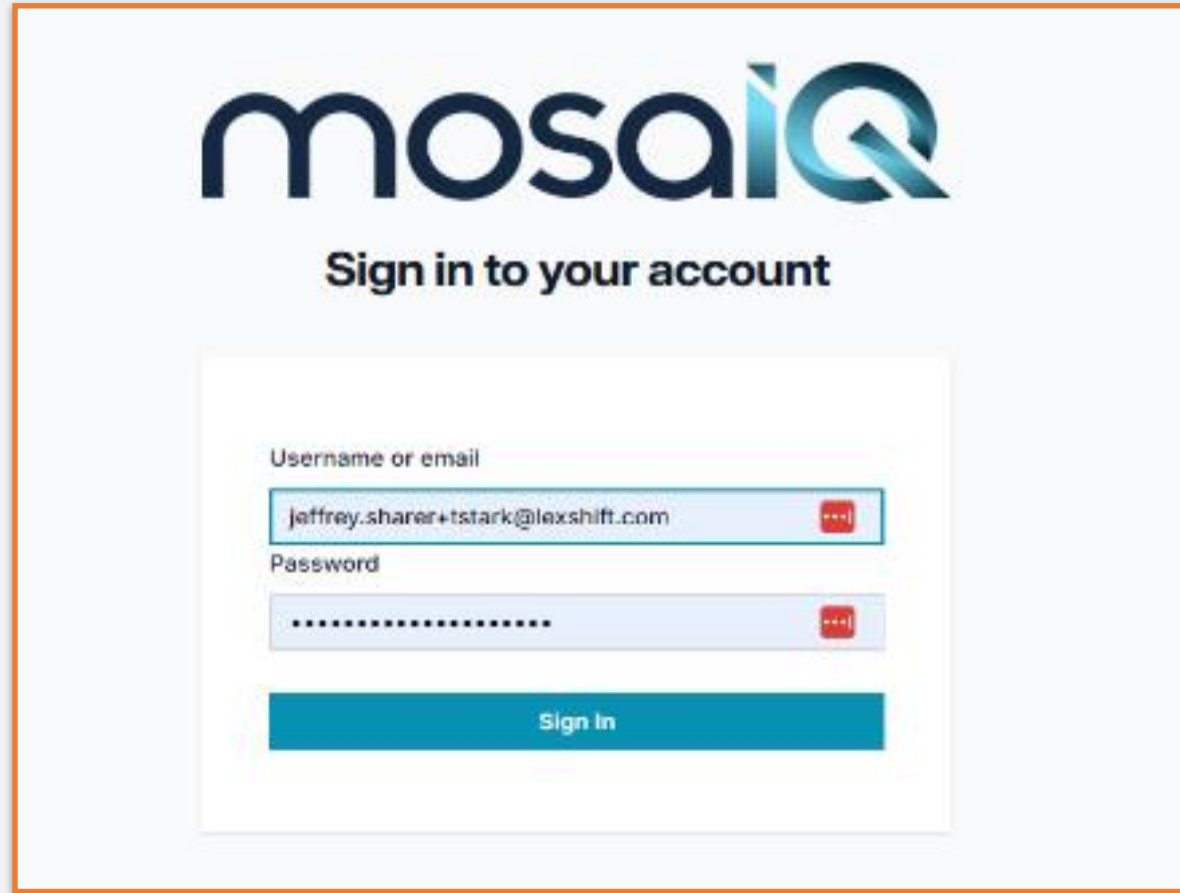


Help Desk

# Inform People and Systems with Retention Rules



# Login Screen



The image shows a login screen for MosaicIQ. At the top is the MosaicIQ logo, which consists of the word "mosaic" in a dark blue sans-serif font and a stylized "IQ" in a lighter blue with a circular arrow around the "Q". Below the logo is the text "Sign in to your account" in a bold, dark blue font. Underneath this is a white rectangular box containing the login form. The form has two input fields: "Username or email" and "Password". The "Username or email" field contains the text "jeffrey.sharer+tstark@lexshift.com" and has a red eye icon to its right. The "Password" field is filled with dots and also has a red eye icon to its right. Below these fields is a blue "Sign In" button.

**mosaicIQ**

**Sign in to your account**

Username or email

jeffrey.sharer+tstark@lexshift.com

Password

.....

**Sign In**

# A Modern Retention Schedule

The screenshot displays the iQ Retention Schedule interface. The top navigation bar includes 'Dashboard', 'Schedule' (active), 'Requirements', and 'Settings'. The user is logged in as 'Stark Industries' with the initials 'JI'.

On the left, there is a 'Search Wizard' button and a 'All Functions' dropdown menu. On the right, there are 'Share & Export', 'Add Series' (+), and 'Sort Series by Code: A > Z' (dropdown) buttons, along with a 'Filters' button.

A filter bar at the top of the main content area shows 'Filter: Series' (dropdown), 'Contains' (dropdown), and an 'Enter value...' input field, with a 'Clear filters' button on the right.

The main content area is titled '125 Series' and contains two series entries:

- Administration**
  - Series: **ADM100**
  - Departmental Administration and Management**
  - Records documenting departmental administration, planning, and management activities, as well as general, administrative correspondence not covered elsewhere.
  - Retention Period**
    - minimum **duration of business need** from record creation
    - and maximum **3 years** from record creation
    - except if China, then minimum 30 years** from record creation
- Administration**
  - Series: **ADM110**
  - Project Management, Management Reporting and Presentations**
  - Records related to planning and execution of projects not covered elsewhere.
  - Retention Period**
    - minimum **5 years** from record creation
    - except if China, then minimum 30 years** from record creation
    - except if Brazil, then minimum 20 years** from record creation

# *Orchestrates* Information Governance Requirements



Over 340,000 requirements in more than 350 jurisdictions around the world

# A Modern Retention Schedule

Organized by key business function

## Retention Period

minimum **duration of business need** from record creation  
**and** maximum **3 years** from record creation  
**except if China, then minimum 30 years** from record creation

Clear, meaningful names and descriptions

Easy to reference Record Series codes

Administration

Series

ADM100

Departmental Administration and Management  
Records documenting departmental administration, planning, and management activities, as well as general, administrative correspondence not covered elsewhere.

Series

ADM100

Departmental Administration and Management

Records documenting departmental administration, planning, and management activities, as well as general, administrative correspondence not covered elsewhere.

## Departmental Administration and Management

Records documenting departmental administration, planning, and management activities, as well as general, administrative correspondence not covered elsewhere.

Administration

Series

ADM110

Project Management, Management  
Records related to planning and management activities, as well as general, administrative correspondence not covered elsewhere.

Compliance

Events  
Retention Periods

that can be understood (and implemented!)

# Add Examples: Where Magic Happens

Dashboard Schedule Requirements Settings Stark Industries JI

Series Departmental Administration and Management > Type Business correspondence sent and received

Type  
**Business correspondence sent and received** Edit Type

Description  
Correspondence sent and received by Stark Industries in the ordinary course of business.

Notes

No Examples  
Get started by creating a new Example.  
New Example

No Requirements  
Get started by mapping a Requirement.  
Map Requirement

# Content Types, Examples and Regulations

| Type and Description                                                                                                                                                                      | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Associated Requirements                                                                                                                                                                                                                                                                                                                                                                                                                           |                           |      |           |         |    |                                             |           |                           |              |      |           |         |    |                                             |           |                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------|-----------|---------|----|---------------------------------------------|-----------|---------------------------|--------------|------|-----------|---------|----|---------------------------------------------|-----------|---------------------------|
| <div><div>Business license applications and renewals</div><div>Applications and documentation for obtaining and renewing required business licenses for operational legality.</div></div> | <div>Amendments to business licenses</div> <div>Business license applications for new jurisdictions</div> <div>Business license renewal notices</div> <div>Correspondence with licensing authorities</div> <div>Documentation of compliance with license requirements</div> <div>Proof of payment for business license fees</div> <div>Record of inspections related to license renewals</div> <div>Records of business license revocations</div> <div>Records of fines or penalties related to license violations</div> | <table><tr><th>Jurisdiction</th><th>Name</th><th>Retention</th><th>Trigger</th></tr><tr><td>CN</td><td>Article 4.1.3 (attachment) Provisions on...</td><td>permanent</td><td>From the date of creation</td></tr></table> <table><tr><th>Jurisdiction</th><th>Name</th><th>Retention</th><th>Trigger</th></tr><tr><td>CN</td><td>Article 1.2 (attachment) Provisions on t...</td><td>permanent</td><td>From the date of creation</td></tr></table> | Jurisdiction              | Name | Retention | Trigger | CN | Article 4.1.3 (attachment) Provisions on... | permanent | From the date of creation | Jurisdiction | Name | Retention | Trigger | CN | Article 1.2 (attachment) Provisions on t... | permanent | From the date of creation |
| Jurisdiction                                                                                                                                                                              | Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Retention                                                                                                                                                                                                                                                                                                                                                                                                                                         | Trigger                   |      |           |         |    |                                             |           |                           |              |      |           |         |    |                                             |           |                           |
| CN                                                                                                                                                                                        | Article 4.1.3 (attachment) Provisions on...                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | permanent                                                                                                                                                                                                                                                                                                                                                                                                                                         | From the date of creation |      |           |         |    |                                             |           |                           |              |      |           |         |    |                                             |           |                           |
| Jurisdiction                                                                                                                                                                              | Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Retention                                                                                                                                                                                                                                                                                                                                                                                                                                         | Trigger                   |      |           |         |    |                                             |           |                           |              |      |           |         |    |                                             |           |                           |
| CN                                                                                                                                                                                        | Article 1.2 (attachment) Provisions on t...                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | permanent                                                                                                                                                                                                                                                                                                                                                                                                                                         | From the date of creation |      |           |         |    |                                             |           |                           |              |      |           |         |    |                                             |           |                           |

# Record Attribute Tags

21

Tax

Edit

Remove

22

Treasury

Edit

Remove

Security Classification

Edit

Add Tag

1

Highly Restricted

Edit

Remove

2

Internal

Edit

Remove

3

Public

Edit

Remove

4

Restricted

Edit

Remove

System of Record

Edit

Add Tag

1

Fileshares

Edit

Remove

2

OneDrive

Edit

Remove

3

SalesForce

Edit

Remove

4

SAP

Edit

Remove

5

SharePoint

Edit

Remove

# Regulatory Update Notifications

Schedule Stats

Total

% Reviewed

Jurisdictions Available

331

>

Total Functions

31

>

Total Series

125

>

Total Types

717

Total Examples

1969

Total Requirements

678

Requirement Updates

●

(United States) 17 C.F.R. § 210.2-06 (a) (2003) (used in 5 Series)

Sep 27, 2024

⚠

(Luxembourg) Article 10 Commercial Code (used in 1 Series)

Sep 27, 2024

✓

(Luxembourg) Article 5 Commercial Code (used in 1 Series)

Aug 12, 2024

●

(United States) 26 C.F.R. § 1.6001-1 (1960) (used in 10 Series)

Jul 27, 2024

●

(United States) 17 C.F.R. § 210.2-06 (a) (2003) (used in 10 Series)

Jul 2, 2024

Recent Activity

●

Tony commented on Type

1d ago

●

Alfred commented on Series

5d ago

●

Beth reviewed citations in Type

10d ago

●

Beth reviewed citations in Type

10d ago

●

Beth reviewed citations in Type

10d ago

# End User Search Capabilities



Dashboard

Schedule

Requirements

Settings

Stark Industries

JL

Full Schedule

What kind of records are you looking to retain or dispose?

1099

Unsure? Narrow down your search.

1 Series

Tax

Series

TAX100

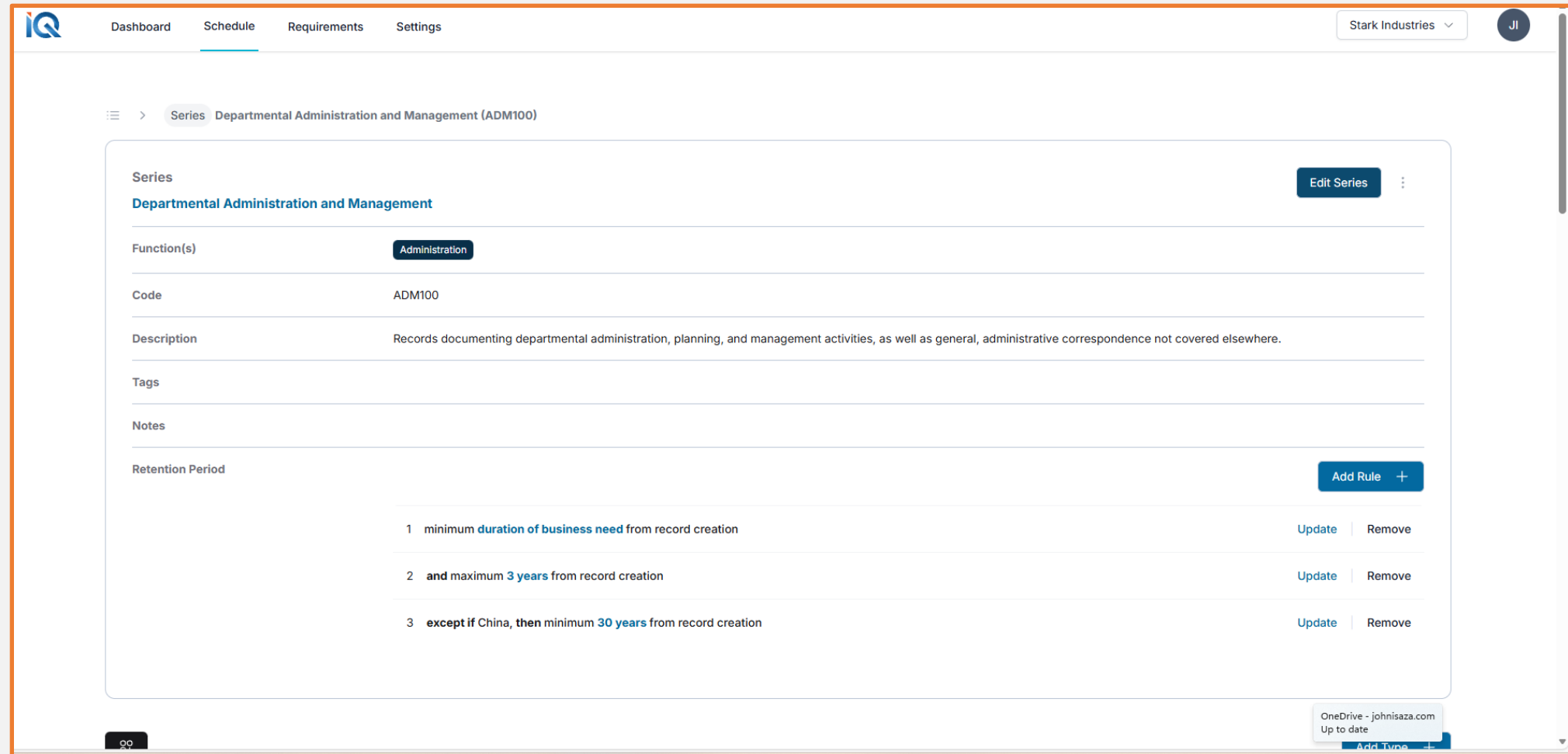
Corporate Income, Payroll, and Excise Taxes

Records related to Stark Industries's corporate income, payroll, and excise taxes, documenting compliance and strategic tax planning.

Retention Period

minimum permanent from record creation

# *Editable Fields and Ability to Add Regulations*



The screenshot displays the Lexshift interface for configuring a record series. The top navigation bar includes 'Dashboard', 'Schedule', 'Requirements', and 'Settings'. The user is logged in as 'JI' under 'Stark Industries'.

The main content area shows the 'Series' configuration for 'Departmental Administration and Management (ADM100)'. The fields are as follows:

- Series:** Departmental Administration and Management (with an 'Edit Series' button)
- Function(s):** Administration
- Code:** ADM100
- Description:** Records documenting departmental administration, planning, and management activities, as well as general, administrative correspondence not covered elsewhere.
- Tags:**
- Notes:**
- Retention Period:** A table of rules for record retention.

| Retention Period                                              | Update | Remove |
|---------------------------------------------------------------|--------|--------|
| 1 minimum duration of business need from record creation      | Update | Remove |
| 2 and maximum 3 years from record creation                    | Update | Remove |
| 3 except if China, then minimum 30 years from record creation | Update | Remove |

At the bottom right, there is a notification for 'OneDrive - johnisaza.com' and a status 'Up to date'.

# Search Specific Requirements

 Dashboard Schedule Requirements Settings Stark Industries JI

## Search Requirements

Advanced

Keywords: personal information

Jurisdictions: United Kingdom of Great Britain and Northern Ireland

Map to Schedule

Items per page 40 1 - 7 of 7 Previous Next

| <input type="checkbox"/> | Jurisdiction                                         | Category                     | Subcategory                               | Type                                            | Description                                                                         | Retention Period                                                                                                | Reference Name                                                      | Link                 |
|--------------------------|------------------------------------------------------|------------------------------|-------------------------------------------|-------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|----------------------|
| <input type="checkbox"/> | United Kingdom of Great Britain and Northern Ireland | Human Resources (HR) records | Recruitment and candidate records         | Background checks                               | Information relating to personal information obtained for vetting purposes          | maximum 0 days from the date the record is no longer necessary for the purposes for which it is being processed | Pre-employment vetting of candidates                                | <a href="#">Link</a> |
| <input type="checkbox"/> | United Kingdom of Great Britain and Northern Ireland | Health and safety records    | Workplace and equipment design and safety | Epidemic and pandemic safety including COVID-19 | Information relating to personal information collected for contact tracing purposes | minimum 21 days from the date of creation                                                                       | Article 9 Guidance for the hospitality industry in Northern Ireland | <a href="#">Link</a> |
| <input type="checkbox"/> | United Kingdom of Great Britain and Northern Ireland | Health and safety records    | Workplace and equipment design and safety | Epidemic and pandemic safety including COVID-19 | Information relating to personal information collected for contact tracing purposes | minimum 21 days from the date of creation                                                                       | Article 9 Guidance for the hospitality industry in Northern Ireland | <a href="#">Link</a> |

# Download Capabilities

The screenshot displays the Lexshift application interface with a modal dialog box open. The dialog box, titled "How would you like to share the schedule?", contains the following elements:

- Function(s) Selected:** A text input field with the placeholder text "To see all Functions, leave blank".
- Choose format:** Two radio buttons: ☒ PDF and ☐ Excel.
- Advanced settings:**
  - View Requirements?:** A toggle switch that is currently turned on.
  - Show Requirements:** Two radio buttons: ☒ By Series and ☐ By Type.
  - Length:** Two radio buttons: ☒ Shortened: Citation only and ☐ Standard: Full Requirement.
- Download:** A blue button at the bottom right of the dialog.

The background interface shows a navigation bar with "Dashboard", "Schedule", "Requirements", and "Settings". The "Schedule" tab is active. Below the navigation bar, there is a "Search Wizard" section with a "Search Wizard" button and a "Filter:" section with "Series" and "Contains" dropdowns. The main content area displays a list of series, including "125 Series" and "Administration" with sub-series "ADM100" and "ADM110".

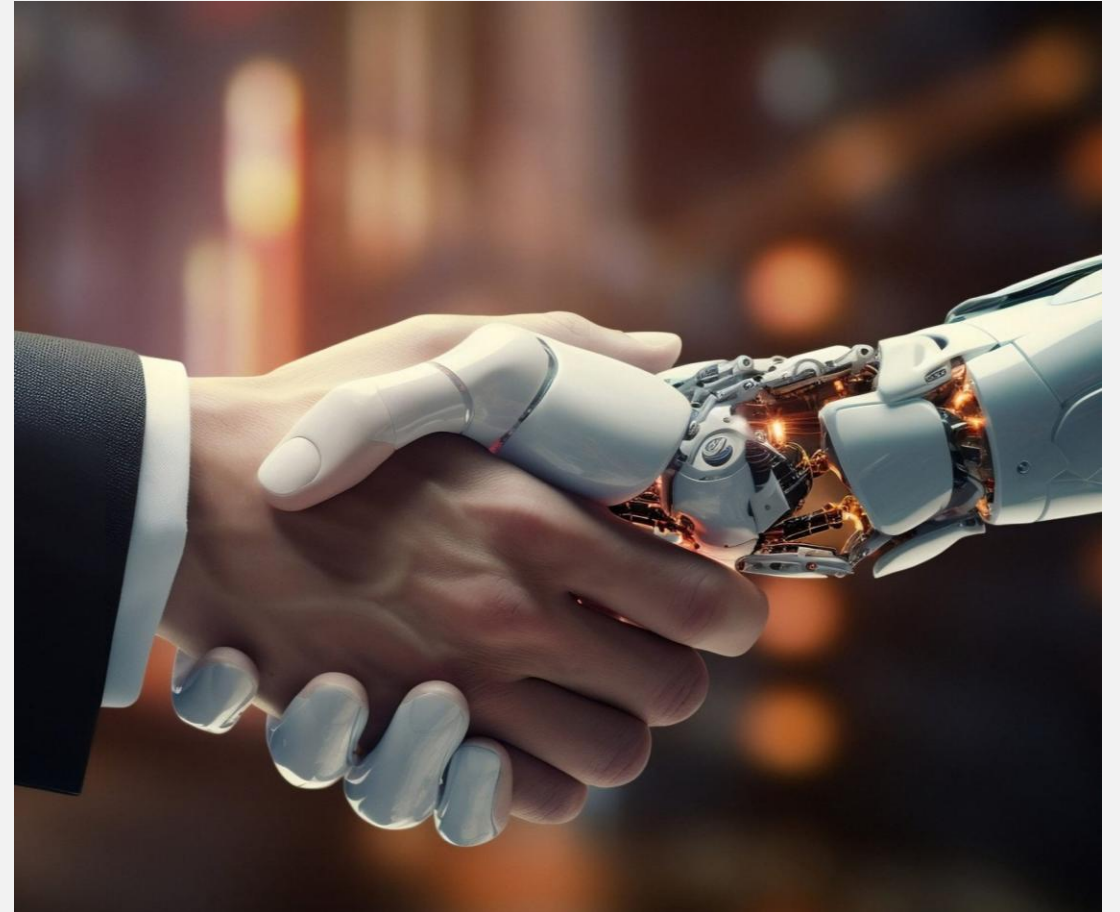
# Part 3

## Ways to Future Proof Your RRS

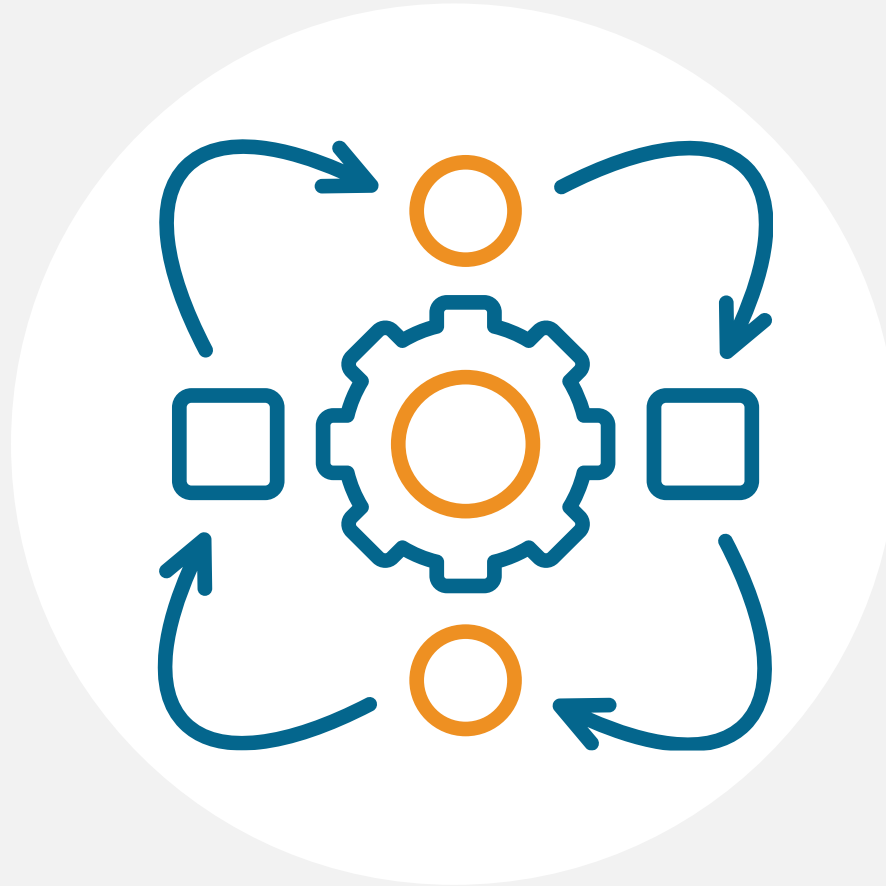


# *AI Effect on RIM Practices*

- ① Auto-classification within grasp
- ① Relatively simple ROT clean-up
- ① Impact of RRS and importance of record examples
- ① Other attribute classification
  - Part numbers
  - Sensitive PI
  - Security classification



# *Updates of IG-Related Policies*



# *Key Policies And Procedures*



RIM Policy



Privacy Policy, including Terms & Conditions



Cyber-Security Policies

- Data Classification Policy
- Confidential Information Policy
- Incident Response Policy



Legal Hold Policy & Procedure



Records Management Procedures Manual

# *Revise All Existing Departmental Policies to Harmonize with RIM Policy and Broader Information Governance Documents, including:*

-  Business continuity
-  Restricted confidential or sensitive materials shredding
-  Customer services
-  Use of customer information
-  Notification of a security breach
-  Computer equipment secure data disposal
-  Vital records
-  Electronic data retention backup
-  Email retention and backup for Exchange/Outlook folders and systems backups
-  File system management
-  AI-enabled recordings + retention concerns
-  Proper disposal of company property and materials

# *Before You Start, Ask Yourself:*

- Does my organization have a formal RIM team? If not, who owns or oversees it?
- How is my retention schedule managed today, and what has been the hardest part of keeping it current?
- How do we manage global or multi-jurisdictional retention requirements today?
- When someone asks why a specific retention rule exists, how easy is it to point to the underlying legal citation or rationale?
- Who is expected to use the retention schedule in practice - just the records team or also Legal, Compliance, IT, and/or business users, and how do they typically access it today?
- How are retention rules intended to be applied to systems like Microsoft 365, shared drives, or other repositories?
- If my retention schedule were working exactly the way I would want, what would it make easier?

# Take Aways:

1

Modern practice is to lean into cloud-based platforms for RRS management

- Single point of truth
- No cumbersome Excel spreadsheets

2

End-User Google-like search capabilities

3

Update RIM Policy

4

Harmonize related policies

5

Questions to ask yourself about the state of your program

# Questions ?



# Thank You!



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