WHITE PAPER

Evidence Retention.

Keep what proves.
Purge what you must.

How long to keep access review evidence, how to reconcile it with data minimisation, and how to purge without breaking the chain of proof.

EXECUTIVE SUMMARY

Evidence must last long enough to prove, and not longer than it should.

Access review evidence has two opposing constraints. It must be kept long enough to answer an auditor, a supervisor or a court, sometimes years after the review. And it contains personal data, which data protection law says must not be kept longer than necessary.

Most organisations resolve the tension by default: they keep everything, forever, in formats nobody could verify. That satisfies neither constraint.

This paper describes a retention approach for certification evidence: periods defined by purpose, purges that are themselves recorded, and a sealed chain that can be shortened without being altered.

Two constraints
Long enough to prove, no longer than necessary.

Defined by purpose
Each category of evidence, its own period.

Recorded purges
Deleting evidence is itself an auditable event.

Shortened, not altered
A purge trims the chain; it never breaks it.

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01

Two constraints in tension

On one side, evidence serves accountability. An auditor testing a period, a supervisor investigating an incident, or a dispute arising years later may all require proof of who decided what, and when.

On the other side, the GDPR's storage limitation principle requires personal data to be kept no longer than necessary for the purposes for which it is processed. Review records contain names, roles, decisions and comments: they are personal data.

“Long enough to prove. No longer than necessary.”

KEY IDEA

DEFINITION

Storage limitation: the data protection principle that personal data is kept in identifiable form no longer than necessary for its purpose.

02

Define periods by purpose

A single retention period for all evidence is either too short for some purposes or too long for others. Periods are better defined by category and by purpose, and written into the organisation's retention policy.

"Not one period for everything."

KEY IDEA

CATEGORY	WHAT DRIVES ITS RETENTION
Campaign evidence	The audit cycles and supervisory expectations the review serves.
Audit trail	The period over which decisions may need to be reconstructed.
Observations	The comparisons needed to assess change and validity.
Comments and justifications	Their value as context for a decision, weighed against their personal content.

The periods themselves are a legal and business decision for each organisation; this paper does not prescribe them.

03

Purge without breaking the chain

Sealed evidence raises a specific question: if records are chained by fingerprint so that any alteration shows, how can old records be deleted without the deletion looking like tampering?

The answer lies in how the chain is organised. When events are sealed by segment, a whole segment can be purged at the end of its retention period. The trail becomes shorter, but what remains still verifies: the chain starts later, it is not broken in the middle.

“A purged segment shortens the trail without altering it.”

KEY IDEA

DEFINITION

Segment: a sealed portion of the audit trail, covering a period, that can be retained or purged as a whole.

04

Purges are evidence too

A purge that leaves no trace is indistinguishable from data loss or concealment. Each purge should therefore be recorded: what was purged, under which rule, when, and by whose authority.

That record lets an auditor understand why evidence older than a given date is no longer available, and confirms that its absence follows a policy rather than an accident.

“Deleting proof is itself an event to prove.”

KEY IDEA

- **What.** The category and period purged.
- **Why.** The retention rule that applied.
- **When and by whom.** The date and the authority behind the purge.

05

Verifiable for as long as it is kept

Keeping evidence is pointless if it can no longer be verified when needed. Verification depends on the records, their seals, and the public keys of the sealing authority being available for the whole retention period.

Exporting evidence in open formats, with the verifier and its keyring published, ensures that what is kept remains checkable even if tools change, and even after leaving a vendor.

“Evidence that cannot be verified is only stored.”

KEY IDEA

06

Where to start

Retention for certification evidence is best designed before the volume of evidence makes it urgent.

“Write the periods down before the first purge.”

KEY IDEA

1 **Classify certification evidence** by category and purpose.

2 **Set a period for each** in the retention policy, with legal advice.

3 **Seal by segment** so that purges trim rather than break.

4 **Record every purge** with its rule, date and authority.

5 **Keep verification possible** for everything still retained.

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