

PIPEDA Self-Assessment Tool
Personal Information Protection and Electronic Documents Act

Retention and Destruction

- Review your organization's information holdings to determine if all personal information on file was collected for specific purposes and whether it is still necessary to fulfill the purposes for which it was collected or to comply with legislative requirements;
- If you determine that some personal information on file has no specific purpose or is no longer necessary, use appropriate safeguards to destroy, erase or anonymize it;
- Develop guidelines and implement secure procedures to retain and destroy personal information. Set retention and destruction schedules, including minimum and maximum retention periods, taking into account any legislative requirements which apply to your organization;
- Where personal information is used to make a decision about an individual, set a retention period that will give the individual a reasonable amount of time to access the information after the decision is made;
- Base your organization's retention policy and practices on the premise that information should be retained only as long as necessary for the fulfillment of the purposes for which it was collected;
- Conduct periodic audits or spot-checks of your holdings to ensure personal information is not being retained beyond established time frames;
- To prevent improper disclosure, establish secure methods for destroying information no longer needed (e.g., shredding paper files or securely deleting electronic records). Consider, for example, the risks associated with the disposal of computers where personal information has been left on the hard drive;
- Develop policies and/or contracts which apply to third parties engaged in the disposal of personal information on behalf of your organization; and
- For guidance on retention of personal information your organization collected before it became subject to PIPEDA, refer to the OPC document, *Best Practices for Dealing with Pre-PIPEDA Personal Information* available at <http://www.priv.gc.ca/>.

LINK: http://www.priv.gc.ca/information/pub/ar-vr/pipeda_sa_tool_200807_e.cfm#principle5



