# System Data Deletion Standard

## Related Policy

* 700.00 Global Information Governance Policy

## Purpose

This standard defines the period of time that data is stored within specific Alight systems, or portions of systems, after which the data is eligible for automated deletion. These system retention rules DO NOT change or impact retention obligations defined by Alight’s Records Retentions Schedules, statutes, regulations, or client requirements. Any data subject to retention must be stored outside of these systems in order to meet those retention obligations.

## **Standard Statements**

### General

* 1. All Alight data that must be retained to meet legal, regulatory, business or client requirements must be stored in a location or system other than the systems listed in this standard that meets the requirements of the Global Information Governance Policy and related policies and standards.
  2. Information that is on hold must be preserved and excepted from any disposition activity as defined by the Alight Global Information Governance Policy.

### System-Specific Maximum Data Storage Durations

* 1. **ProofPoint** – Data is stored for 10 years from the date the data is sent from, or received by, a messaging system that is, or has been, configured to have specific content archived in ProofPoint.
  2. **Microsoft Exchange**
     1. Email is stored in an active colleague’s individual mailbox per the following rules:

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| --- | --- | --- |
| Folder | Rule | |
| *Applies to all subfolders of the named folder below* | *Storage Period* | *Action* |
| **Inbox2** | 15 months  (rolling—based on message received date) | Remove from mailbox1 |
| **Drafts2** | 1 year | Remove from mailbox1 |
| **Managed Folders /  Old Inbox Items / Inbox2** | 1 year  (rolling—based on message received date) | Remove from mailbox1 |
| **Conversation History2** | 30 days  (rolling—based on item creation date) | Permanently delete  *Cannot be recovered* |
| **Deleted Items3** | 90 days  (rolling—based on received/sent/creation date) | Remove from mailbox1 |
| **Sent Items2** | 15 months  (rolling—based on received date) | Remove from mailbox1 |
| **Journal2** | 15 months  (rolling based on received/creation date) | Remove from mailbox1 |
| **RSS Feeds2** | 30 days  (rolling—based on received/creation date) | Remove from mailbox1 |
| **Calendar2** | 2 years | Remove from mailbox1 |
| **Junk E-mail2** | 90 days | Remove from mailbox1 |

1All messages can be recovered for an additional 30 days after deletion, except for Conversation History.

2This folder has a deletion policy associated with it (i.e., Inbox, Sent, Conversation History, Drafts, etc.).

3Deleted Items: Messages are deleted 90 days from the received/sent/created date.

* + 1. Data is stored in a terminated colleague’s individual mailbox for 90 days after the colleague termination date.
  1. **OneDrive** – Data is stored in an OneDrive space allocated to an individual colleague for 90 days after the colleague is terminated.
  2. **‘H:’ Drive** – Data is stored on a network drive allocated as a ‘home’ (‘H:’) drive to an individual colleague for 90 days after the colleague is terminated.
  3. **Lotus Notes Individual Colleague Mailboxes**
     1. An Individual colleague Lotus Notes mailbox must meet all of the following conditions to be considered eligible for deletion:
        1. A specific colleague must have been allocated an individual colleague Lotus Notes mailbox prior to the deployment of Microsoft O365 BPOS Exchange.
        2. The specific colleague must have been allocated an individual colleague Microsoft O365 Exchange BPOS mailbox as part of the deployment of Microsoft O365 BPOS Exchange
     2. Lotus Notes individual colleague mailboxes that meet the above conditions are deleted 7 years after the colleague was provisioned with an individual colleague Microsoft O365 BPOS Exchange mailbox.
     3. Active colleagues and managers of terminated colleagues with Lotus Notes and Microsoft mailboxes that meet the above conditions must be advised of the impending deletion of the Lotus Notes mailbox at least 30 calendar days prior to the deletion taking place.
     4. An Individual Colleague Lotus Notes mailbox allocated to a colleague that was not issued a Microsoft O365 BPOS Exchange mailbox is deleted 90 days after the colleague is terminated.

## References and Mandates

* None

## Legal Conflicts

Alight’s Security Policies and Standards were drafted to address the protections found in existing laws and regulations and may be amended as necessary due to law, regulation, or business requirements. There is no intent to conflict with relevant laws or regulations. In the event of any conflict with relevant laws or regulations, they will control.

Alight’s Security Policies and Standards may be supplemented by other policies or standards of Alight. In the case of a conflict or ambiguity, the more specific provisions of any such policy or standard of Alight shall take precedence over the more general provisions contained in Alight’s Security Policies and Standards.

## Document Control Information

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| Primary Contact | [Data](mailto:Data) Protection & Governance | [Information.Governance@aon.com](mailto:Information.Governance@aon.com) |
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# Revision History

Revision History

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| --- | --- | --- | --- |
| Revision Level | Date | Description | Change Summary |
| 1.0 | 2015 September | Original | Document published |
| 1.1 | 2016 July | 2013 Annual Review | Reviewed and validated  Standard Name change to System Data Deletion Standard; Clarified wording; added section on Lotus Notes Mailboxes for colleagues that were issues Lotus Notes individual colleague mailboxes and were later issued MS BPOS Exchange Mailboxes; Replaced all instances of Security Risk Management (SRM) with Global Security Services (GSS) to reflect new organization name |
| 1.2 | 2017 May | 2017 Rebranding | Rebranded policy due to Aon Hewitt divestiture |
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