

Security telemetry is personal data, and the defensive purpose does not suspend the obligation.

Who signed in from where, on which device, reading which files. A platform that retains all of it indefinitely so that evidence is always available has described a liability, not a control.

THE TENSION

Evidence wants long, erasure wants short

Both are real obligations, reconcilable only if retention is a property of the record class, not of the disk it landed on.

THE MECHANISM

Destroy the key, not the haystack

A per-subject key rendered unusable makes that subject's records unreadable across every replica, backup and archive at once — verifiably.

THE RECEIPT

The erasure is itself an event

What was erased, when, on whose instruction, under which basis — recorded without re-recording the content.

One subject, four lifetimes, each with a stated reason

a single global window is wrong twice

authentication	13 months	supports account-compromise investigation; expires on schedule
endpoint telemetry	90 days	the shortest window that still supports hunting and rule backtesting
actions & approvals	7 years	what the organisation did and on whose authority — an accountability record
erasure request	key destroyed	unreadable everywhere at once; the erasure recorded, the content not

WHAT YOU CAN DEMONSTRATE

A lawful basis per class. Each retention window carries the reason it exists, so a notice describes what the platform is actually doing.

Erasure across backups. The one honest answer to a request made against an append-only store, and a verifiable one.

Holds that end. A legal hold has an owner, a scope and an end date. A hold that quietly becomes permanent is how you retain what you promised not to.

WHAT WE WILL NOT CLAIM

There is a residue no architecture dissolves. An incident narrative that names a person's actions is meaningful evidence and remains personal data. The resolution is procedural: minimise what the narrative names, and keep identifying detail in the linked events under their own class.

A vendor claiming to have solved this in the product is overselling.

BRING US YOUR DPIA

A working session with your privacy team, not a slide deck.

Bring the assessment you have to complete. We will walk each class, each window, each transfer, and tell you where the answer is "that is your decision, not ours".

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