

# DIN 66398:2016-05 (E)

## Guideline for development of a concept for data deletion with derivation of deletion periods for personal identifiable information

---

Contents	Page
Foreword .....	5
Introduction .....	6
1 Scope .....	9
2 Terms and definitions .....	9
3 Abbreviations .....	13
4 Basics of a deletion concept .....	13
4.1 General .....	13
4.2 Application of relevant legal requirements .....	15
4.3 What is the meaning of "deletion"? .....	16
4.4 One deletion rule for every type of PII .....	16
4.4.1 Types of PII .....	16
4.4.2 Deletion rules .....	16
4.4.3 Retention period and regular deletion period .....	17
4.4.4 Handling of non-productive pools of data: Archives and backup copies .....	19
4.4.5 Standard deletion periods, starting points, deletion rules and deletion classes .....	19
4.4.6 Deletion in special situations .....	20
4.5 Document structure in the deletion concept .....	20
5 Defining types of PII .....	21
5.1 Pools of data, purposes and types of PII .....	21
5.2 Systematic collection of types of PII .....	22
5.3 Design criteria for the definition of types of PII .....	22
5.3.1 Guidance from the practice .....	22
5.3.2 Orientation towards the legal provisions .....	22
5.3.3 Orientation towards the PII principals .....	22
5.3.4 Orientation towards purposes of data processing .....	23
5.3.5 Orientation towards the sensitivity of data .....	23
6 Specification of deletion periods .....	23
6.1 Using standard deletion periods .....	23
6.2 Period specifications .....	24
6.2.1 Procedure and standard deletion periods .....	24
6.2.2 Methods for the period derivation .....	26
6.2.3 Specification of a catalogue of standard deletion periods .....	27
6.3 Specifics for period specifications .....	27
6.3.1 Regular deletion periods and deviations .....	27
6.3.2 Period changes by compaction with alteration of the type of PII .....	27
6.3.3 Altering the type of PII for special cases with longer periods of use .....	28
6.3.4 Exceptions to regular processes: Suspension of the deletion .....	28
6.3.5 Deviations from standard deletion periods for backup copies .....	28
7 Deletion classes .....	29
7.1 Abstract starting points -- abstract deletion rules .....	29
7.2 Matrix of the deletion classes .....	30
7.3 Types of PII, deletion classes and deletion rules .....	30

<b>8</b>	<b>Requirements for implementation of deletion rules .....</b>	<b>32</b>
8.1	Structure and contents of the requirements for implementation .....	32
8.1.1	Relationship between the document "Deletion rules" and requirements for implementation .....	32
8.1.2	of requirements for implementation .....	33
8.2	Requirements for implementation for cross-sectional areas .....	34
8.3	Requirements for implementation for individual IT systems .....	36
8.4	Individual measures for the deletion of pools of data .....	38
8.4.1	General guidance for requirements for implementation for individual measures .....	38
8.4.2	Requirements for implementation for data objects in everyday business life .....	38
8.4.3	Requirements for implementation for pools of data in regular manual processes .....	39
8.4.4	Requirements for implementation for copies of personally identifiable information for special uses .....	40
8.4.5	Requirements for implementation for remainders in IT systems .....	41
8.4.6	Requirements for implementation for inadmissible pools of data containing PII .....	42
8.5	Requirements for implementation for service providers .....	43
<b>9</b>	<b>Operational and organizational structure: Responsibility and processes for the deletion of personally identifiable information .....</b>	<b>44</b>
9.1	Organizational embedding .....	44
9.2	Management of the organization .....	44
9.3	Role of the privacy authority of the organization .....	45
9.3.1	Responsibility for the document maintenance .....	45
9.3.2	Processes under the responsibility of the privacy authority of the organization .....	45
9.3.3	Release participations .....	45
9.4	Responsibility for requirements for implementation .....	46
9.4.1	Organizational units with responsibility for pools of data with personally identifiable information .....	46
9.4.2	Additional tasks in connection with requirements for implementation .....	47
9.4.3	Organizational unit change management .....	48
9.4.4	Organizational units with responsibility for the control of service providers .....	48
9.5	General reporting obligations .....	48
<b>Annex A (informative) Guidance for a project "Deletion concept"</b>	<b>49</b>	
<b>Annex B (informative) Guidance for the anonymization of personally identifiable information</b>	<b>52</b>	
<b>Annex C (informative) Guidance on provisions for the security of deletion mechanisms</b>	<b>54</b>	
<b>Annex D (informative) Guidance for restriction of processing for pools of data</b>	<b>56</b>	
<b>Bibliography</b>	<b>58</b>	
<b>Tables</b> <b>Table 1 -- Abbreviations used</b>	<b>13</b>	
<b>Figure 1 -- Example of period sections for an 'order' in the deletion concept</b>	<b>18</b>	
<b>Figure 2 -- Possible standard deletion periods of a telecommunications service provider</b>	<b>27</b>	
<b>Figure 3 -- Exemplary matrix of deletion classes for a telecommunications service provider</b>	<b>30</b>	
<b>Table 2 -- Recommendations for the maintenance responsibility and release rules of the document "Deletion rules"</b>	<b>31</b>	
<b>Figure 4 -- Relationship between the document "Deletion rules" and requirements for implementation</b>	<b>32</b>	
<b>Table 3 -- Recommendations with regard to the responsibility for maintenance and to the rules for releasing the "Requirements for implementation for cross-sectional areas"</b>	<b>36</b>	
<b>Table 4 -- Recommendations with regard to the responsibility for maintenance of the "Inventory of data storage media"</b>	<b>36</b>	

<b>Table 5 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for individual IT systems" .....</b>	<b>38</b>
<b>Table 6 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for data objects in everyday business life" .....</b>	<b>39</b>
<b>Table 7 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for pools of data in regular manual processes" .....</b>	<b>39</b>
<b>Table 8 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for copies of personally identifiable information for special uses" .....</b>	<b>40</b>
<b>Table 9 -- Recommendations for the maintenance responsibility and release rules of the "Overview on exceptional rules" .....</b>	<b>41</b>
<b>Table 10 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for remainders in IT systems" .....</b>	<b>42</b>
<b>Table 11 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for inadmissible pools of data containing PII" .....</b>	<b>43</b>
<b>Table 12 -- Recommendations for the maintenance responsibility and release rules of the "Requirements for implementation for service providers" .....</b>	<b>44</b>
<b>Table 13 -- Recommendations for the maintenance responsibility of the "Overview on IT systems and other pools of data containing PII" .....</b>	<b>47</b>
<b>Table 14 -- Recommendations for the maintenance responsibility of the "Needs for action from requirements for implementation" .....</b>	<b>48</b>
<b>Figures</b> <b>Figure 1 -- Example of period sections for an 'order' in the deletion concept .....</b>	<b>18</b>
<b>Figure 2 -- Possible standard deletion periods of a telecommunications service provider .....</b>	<b>27</b>
<b>Figure 3 -- Exemplary matrix of deletion classes for a telecommunications service provider .....</b>	<b>30</b>
<b>Figure 4 -- Relationship between the document "Deletion rules" and requirements for implementation .....</b>	<b>32</b>
<b>Figure A.1 -- Subdivision into project phases .....</b>	<b>50</b>