

# Retention Policy Decision Guide

Retention is a decision per footage class, not a disk size. Engineering guidance, not legal advice - confirm specifics with counsel.

## The two limits

Set the period between a MINIMUM (operational need + any legal/sector rule - how long you MUST keep) and a MAXIMUM (privacy law - how long you MAY keep). GDPR Art. 5(1)(e) + EDPB: routine footage is often only a few days. A specific legal obligation can lift the minimum above the privacy default for that footage; tie every period to a documented purpose.

## Sector minimums - examples (verify against the live rule for your jurisdiction)

Sector	Typical minimum	Note
EU privacy default (routine)	a few days	GDPR Art. 5(1)(e) / EDPB
Public CCTV (UK ICO)	~31 days, purpose-driven	No fixed statutory period
Casino / gaming (Nevada Reg 5)	7 d routine; >=60 d flagged	Event-specific minimums
Cannabis (varies by state)	30-90 days	State program sets it
Retail (operational)	30-90 days	Chargeback window 60-120 d
Banking / financial	~90 d to 6 months	Fraud/dispute practice

Myth: "PCI DSS requires 90 days of video." It sets NO footage retention period - find the real operational/sector reason or shorten.

## Per-class policy template (example rows + your blanks) - one system, many clocks

Footage class	Period	Basis	Deletion
General floor / entrance	14 days	Operational; privacy default	Auto-delete at age
Point-of-sale lanes	90 days	Card-dispute window	Auto-delete at age
Incident-flagged clips	1 yr / until closed	Active case (documented)	Review, then delete
Face-recognition templates	<= 3 yr (BIPA)	740 ILCS 14 schedule	Scheduled destroy + log
_____	_____	_____	_____
_____	_____	_____	_____

## Make deletion happen (checklist)

Policy-driven delete at a stated age (ONVIF Profile G MaximumRetentionTime) - not disk-full overwrite.  Size storage so the policy age is reached before the disk wraps.  Apply a retention rule to exports, backups, and cloud copies.  Log every deletion (what, when, which rule) - accountability, GDPR Art. 5(2).

## Legal hold - freeze and release

On notice of litigation/investigation, freeze the specific clips, cameras, and time ranges.  Keep deleting everything else on the normal schedule (surgical hold).  Exempt held footage from auto-delete - FRCP 37(e) spoliation risk if destroyed.  On resolution, release the hold so footage returns to the retention clock.

Sector minimums are examples - verify against the live regulation for your jurisdiction and re-check periodically. This is engineering guidance, not legal advice; confirm retention and deletion rules with qualified counsel.