

Somalia Data Protection Authority (DPA)

Official Guidance on Data Minimization & Retention Requirements

Status: Official Guidance

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Foreword

This guidance clarifies the obligation to collect and retain only personal data that is necessary, relevant, and lawful. Excessive data retention increases privacy risks and undermines trust.

This guidance reflects the accountability and storage limitation principles under the Somalia Data Protection Act No. 005 (2023).

1.1 Data Minimization Principle

Organizations must ensure that personal data is:

- Adequate
- Relevant
- Limited to what is necessary

Data must not be collected or retained “just in case.”

Organizations must be able to demonstrate that the scope of data collected is proportionate to the stated purpose.

1.2 Collection Controls

Organizations should:

- Clearly define purposes before collecting data
- Avoid collecting excessive or unrelated data
- Review forms and systems regularly
- Disable optional fields that are not necessary

Data collected for one purpose must not be reused for incompatible purposes without a lawful basis.

Purpose limitation must be documented and reflected in internal policies and procedures.

1.3 Retention Requirements

Personal data must be retained:

- Only for as long as necessary
- In line with legal, contractual, or operational needs
- In accordance with documented retention schedules

Retention periods must be clearly documented, justified, and periodically reviewed.

Indefinite retention is not permitted unless explicitly required by law.

1.4 Secure Deletion

At the end of retention periods, data must be:

- Securely deleted
- Irreversibly anonymized
- Destroyed using appropriate technical and physical methods

Deletion must apply to:

- Live systems
- Backups
- Archives

Where deletion from backups is not immediately feasible, access to such backups must be strictly restricted and retention periods enforced.

Organizations must ensure that backup retention policies align with documented retention schedules.

1.5 Review and Auditing

Organizations should:

- Review retention schedules regularly

- Conduct periodic data clean-ups
- Audit legacy systems and databases

Excessive retention is a common compliance failure and may result in enforcement measures.

Revision History

- Version 1.0 – Initial publication (2025)

Disclaimer

This guidance is issued to assist organizations in interpreting and applying the Somalia Data Protection Act No. 005 (2023). It does not replace the Act and does not create new legal obligations beyond those set out in law.

