GDPR Toolkit

DATA + PROCESS MAPPING

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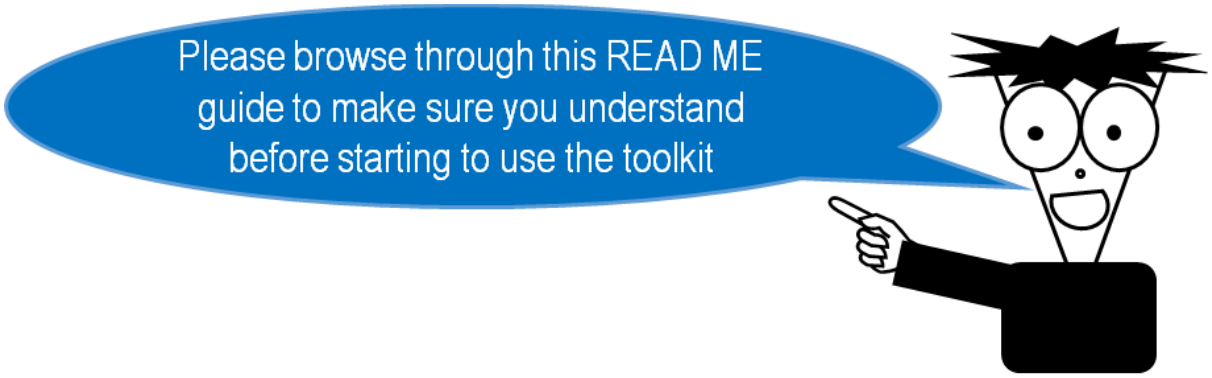
INTRODUCTION
Please read the READ ME User Guide first to make sure you know and understand the need to add, amend, or delete in order to reflect your people, processes and technologies as well as the data you hold and the jurisdiction(s) you operate in.



The READ ME User Guide will you help navigate around the GDPR-Toolkit and identify what you need to do for your organisation.

DISCLAIMER
GDPR can be complicated and there are different laws in UK, EU, Jersey and Guernsey. Simply having Templates, Documents, Samples and Guidance does not make you compliant.

The reason for this disclaimer is that I cannot warrant or guarantee materials for every system or circumstance or jurisdiction and the client/user/recipient is obliged to review, test and where necessary customise or take advice to generally assert that they are satisfied before using this “live”.

If DIY isn’t for you, that’s OK. I’m rubbish at electrical work, plumbing or carpentry. Call an expert. There are many out there and data protection is too important for you, your organisation and the people who trust you with their data for you to get it wrong.

SUPPORT
For those organisations without the resources, skills or experience I can help with training or provide support to customise the documents to meet your particular needs. TimHJRogers@AdaptConsultingCompany.com

MAPPING POLICY, PROCEDURE AND FORMS

TITLE	ACC GDPR Data protection impact assessment procedure.docx	DATE	10/04/18
LOCATION	V:\Data2018\product_gdprtoolkit\ACC GDPR Data protection impact assessment procedure.docx	VERSION	Ver 1
AUTHOR	[Author]	Pages	3 of 7
APPROVER	[Approver]		

1. DATA MAPPING POLICY

This policy and procedure base is based on guidance from the UK ICO and related to Data Protection (Jersey) Law 2018

https://www.jerseylaw.je/laws/enacted/Pages/L-03-2018.aspx
https://www.jerseylaw.je/laws/enacted/Pages/L-04-2018.aspx

The GDPR contains explicit provisions about documenting your processing activities. [Organisation name] must maintain records on several things such as processing purposes, data sharing and retention.

[Organisation name] may be required to make the records available to the ICO on request. Documentation can help you comply with other aspects of the GDPR and improve your data governance. Controllers and processors both have documentation obligations. For small and medium-sized organisations, documentation requirements are limited to certain types of processing activities. Information audits or data-mapping exercises can feed into the documentation of your processing activities. Records must be kept in writing.

Data mapping is about knowing what data you have. In some cases you may also to a data processing impact assessment DPIA, based on the data-mapping. The data processing impact assessment DPIA is detailed in another document.

[Organisation name] must document the following information:

1. The name and contact details of your organisation (and where applicable, of other controllers, your representative and your data protection officer).
2. The purposes of your processing.
3. A description of the categories of individuals and categories of personal data.
4. The categories of recipients of personal data.
5. Details of your transfers to third countries including documenting the transfer mechanism safeguards in place.
6. Retention schedules.
7. A description of your technical and organisational security measures.

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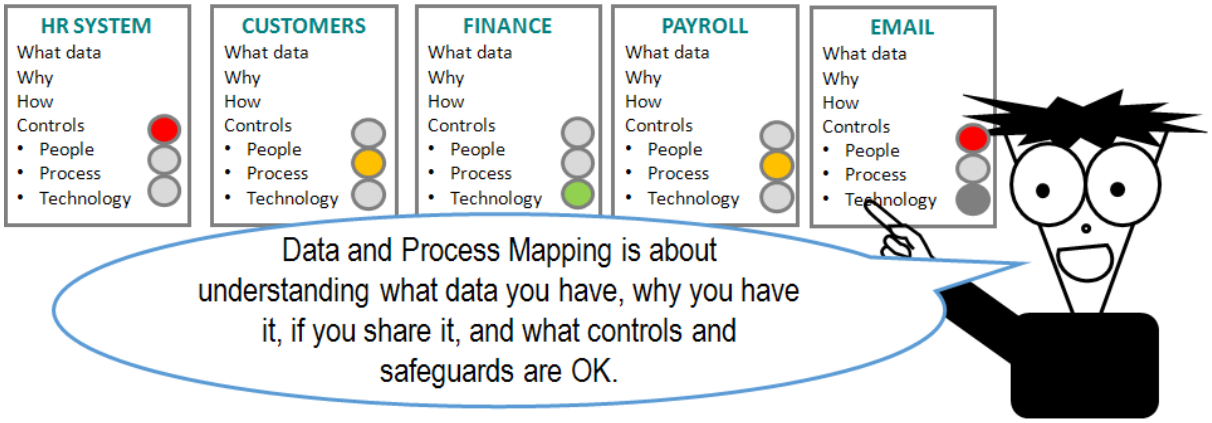
2. DATA MAPPING PROCEDURE

Good data-mapping, with careful planning of what information to capture can help identify all the information needed for

1. A Privacy Notice or Privacy Statement
2. A subject access request
3. A breach notification
4. A data processing impact assessment
5. Any data sharing agreements
6. Any processor-controller agreements



Key data to capture

- information required for privacy notices, such as:
  - the lawful basis for the processing
  - the legitimate interests for the processing
  - individuals' rights
  - the existence of automated decision-making, including profiling
  - the source of the personal data;
- records of consent;
- controller-processor contracts;
- the location of personal data;
- Data Protection Impact Assessment reports;
- records of personal data breaches;
- information required for processing special category data or criminal conviction and offence data under the Data Protection Bill, covering:
  - the condition for processing in the Data Protection Bill
  - the lawful basis for the processing in the GDPR
  - your retention and erasure policy document.

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This may be done using a form or a spreadsheet

SYSTEM	The name of the system eg HR System
NOF_OF_RECS	The number of records eg 1000
FORMAT	The format eg paper or electronic
FRONT_END	Where the keying-in is done eg HR Dept
BACK_END	Where the processing is done eg Cloud
DEPARTMENT	The department eg HR
MANAGER	Person Name/Role
PROCESS_OWNER	Person Name/Role
DPIA_YNDATE	Has a DPIA be done, and when
CONTROLLER	Person Name/Role
PROCESSOR	Person Name/Role
PC_CONTRACT	Is there a Processor/Controller contract ;
SUBJECT	Category(ies) of person(s) eg customer, staff, patient, student,
FIELD-LIST	Data Held eg Bank-Account; home-address; home-phone; IT IS-Tax; mobile-phone; work-phone;
DATA-SCOURCE	Where did the data come from eg From User;
COOKIES YN	Not Applicable;
SUMMARY-PURPOSE	What is the purpose eg or the purpose of employing people, paying them, appraisals etc.
[S]TAT/ [C]ONTRAC	Is this needed eg Required-Contract Purpose
AUTO YN	NO-Automated Processes
LAWFUL BASIS	On what lawful basis eg 2 Contract (b) the taking of steps at the request of the data subject with a view to entering into a contract. ;
HOW LONG WE HOLD DATA	10 years
DATA-CLASSFICATION	2-Confidential;
SHARED WITH	none
THIRD COUNTRY	Not Applicable;

3. DOCUMENT CONTROL

[document owner] is the owner of this document and is responsible for ensuring that this procedure or process is reviewed in line with the review requirements.

Consultation Phase: A document which is circulated for comment to key stakeholders to ensure support for scope, format, and content.

Draft Phase: Ostensibly the last draft, capturing all the points from the previous consultation phase and circulated for comment before being finalised.

Final Phase: A document which is FINAL. This is the baseline document which may subsequently amend over time.

VERSION	DESCRIPTION OF CHANGE	AUTHOR	APPROVAL	DATE OF ISSUE
Consultation	Initial Issue for consultation.	[Author]	[Approver]	March 2018

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DATA MAPPING FORM

DEPARTMENT	
MANAGER	
DATE	

SYSTEM	NOF_OF-RECS	FORMAT	FRONT_END	BACK_END	DEPARTMENT	MANAGER	PROCESS_OWNER	DPIA_YNDATE	CONTROLLER	PROCESSOR	PC_CONTRACT	SUBJECT	FIELD-LIST	DATA-SCOURCE	COOKIES YN	SUMMARY-PURPOSE	[S]TAT/ [C]ONTRAC	AUTO YN	LAWFUL BASIS	HOW LONG WE HOLD DATA	DATA-CLASSFICATION	SHARED WITH	THIRD COUNTRY

Sign-Off / Approval