

Owner Data Processing Record Guidelines and Points to Note

The new data protection legislation comes into force on 25th May 2018.

Why do I need this document?

GDPR requires organisation to record information about their processing activities in respect of personal data and to provide this information to the Information Commissioners Office if required to do so.

This document is designed to be a template for your business to adapt to help you comply with those requirements.

What do I need to do?

There is no one size fits all and whilst we have tried to make this as easy as possible, you must carefully review this template and customise it to ensure it reflects what your business uses personal data, for who send it to and how you keep this secure.

Do I have to do this?

There is some uncertainty as to whether all organisations are legally obliged to produce a record of processing. There is a general duty for those who employ 250+ people. Those who employ fewer than 250 employees must keep a record where the processing is likely to result in a risk to rights and freedom of individuals or the processing is not occasional or includes special category data or criminal conviction data.

Given that communication with owners is more than occasional, you may decide that it is administratively easier simply to keep such a record of all processing activities. It is a tool you can use to show compliance and should also help you understand how you use your client data and what legal grounds you have to do so. It should be reviewed and kept up to date to reflect how you process data.

The template document has been prepared to help you comply with the new data protection regulations in place from 25th May 2018.

You must customise the text in the template document to ensure that all the information matches what actually happens in your own organisation – any audit you have carried out in order to prepare for GDPR will help you do that.

Detailed information is available on the ICO website (www.ico.org.uk).