

1.3 Personal Data Mapping Procedure

Personal Data Mapping Procedure

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1 Introduction

Winterborn and Little Associates Ltd collects, stores, processes and transfers a wide variety of personal data as part of its business operations. This data, about living individuals, is subject to a number of legal obligations regarding its protection and use, including from the EU General Data Protection Regulation (GDPR). In order to understand, and be able to prove, that we are meeting these obligations, we must have a clear and complete picture of the personal data involved.

The purpose of this procedure is to define and document the personal data involved in one or more business processes. This is key to making sure that we only collect data that are necessary for legitimate purposes, that we are able to assess the risk to those data, and that we stay within the law at all times.

This procedure may be used as part of an initial exercise to capture information about all of the personal data used within the organisation, as part of an individual data protection impact assessment exercise, or simply to assess the use of personal data in a single business process, system or area.

2 Personal Data Mapping Procedure

2.1 Prerequisites

Before starting the procedure, the following prerequisites must be in place:

- The scope of the data mapping exercise must have been defined in appropriate terms such as business process(es), systems, customers, locations, organisation or products and services. i.e. how personal data is received and stored.
- People with an understanding of how the relevant business process(es) or other areas operate must be involved
- A suitable level of understanding of the GDPR must be available

2.2 Timing and Scheduling

This procedure can be initiated at any time when there is a requirement to document and understand the use of personal data.

2.3 Procedure

The following steps are required:

1. Use a fresh copy of the *Personal Data Capture Form* and record the security classification (e.g. Internal Use Only, Confidential), the date of completion and the name of the person completing the form in the appropriate boxes.
2. Take each business process within scope and record the personal data items that are captured or used within the process.
3. Complete all columns of the spreadsheet for each personal data item, using the Completion Instructions tab for guidance about the meaning of each one.
4. From the completed form, identify any areas that need further investigation, in particular:
 - a. Uses of personal data that require consent, where that consent is not currently obtained
 - b. Collection of personal data that fall into the definition of special categories under the GDPR
 - c. Areas where information is not known e.g. the storage location of data in cloud applications
 - d. The controls in place over the personal data e.g. encryption and access control

5. Record any actions arising from the analysis within the table on the Actions tab of the form.
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2.4 Error Handling

The following common errors may occur during this procedure:

Stage of Procedure	Error	Possible Cause	Recommended Action

Table 1 - Error handling

2.5 Support and Escalation

If an error occurs which cannot be corrected using this procedure, support should be obtained using the following information:

Support Person	Role	Email	Hours of availability

Table 2 - Support contact information

2.6 Auditing and Logging

Information about personal data may be recorded on the *Personal Data Capture Form* and/or on a *Personal Data Mapping Diagram*.

2.7 Monitoring

There is no requirement to regularly monitor any part of this procedure.