

DATA PROTECTION



May 2021

Planning for a Pillar 9 Assessment

INTRODUCTION

Based on recent Pillar 9 audits carried out by 2twenty4, the following is a summary of the documentation and processes that have been required by the auditors.

Please note the exact content can vary depending on the auditor.

REQUIRED DOCUMENTS

- Privacy Policy
- Data Retention Policy
- IT Security Policy
- Data Retention Schedule
- Data Protection Team Organisational Chart
- Record of Processing Activities
- Data Breach Reporting Process
- Data Subject Access Process
- Privacy Notices (General, Procurement and Employee)
- DPIA Template
- Data Controller/Processor Guidance
- 3rd Party Checklist
- 3rd Party Data Processing Agreement
- Cross-border Transfer Agreement

REQUIRED PROCESSES

- Data Breach Reporting Process
- Data Subject Request Process
- Procurement Due Diligence Process
- Privacy by Design (DPIA) Process
- Training Program

PRIVACY POLICY CONTENTS

The following is a summary of detail required for the Privacy Policy:

HEADING/SUB-HEADING

- 1 Scope of Policy/Guidelines
 - 1.1 Scope
- 2 Definitions
 - 2.1 Definitions
- 3 Processing of Special Category Data
 - 3.1 Special Category Data
- 4 Application of Principles
 - 4.1 Principles
 - 4.2 Principal 1: Legitimate, Fair and Transparent Processing
 - 4.3 Principal 2: Purpose Limitation
 - 4.4 Principal 3: Data Minimisation
 - 4.5 Principal 4: Data Accuracy
 - 4.6 Principal 5: Storage Limitation
 - 4.7 Principal 6: Security
 - 4.8 Principal 7: Transfer of Personal Data
 - 4.9 Principal 8: Accountability and Review
- 5 Rights of Data Subjects
 - 5.1 Rights of Data Subject
 - 5.2 The Right to Information
 - 5.3 The Right to Rectification
 - 5.4 The Right to Erasure
 - 5.5 The Right to Object to processing

- 6 Data Retention
 - 6.1 Data Retention Policy/Schedule
- 7 Data Breaches
 - 7.1 Data Breach Process
- 8 Privacy by Design
 - 8.1 Privacy by Design Processes
- 9 Storage, Back-Up and Disposal of Personal Data
 - 9.1 Storage and Back-Up
 - 9.2 Destruction
- 10 Procurement
- 11 Financial Instruments
- 12 Audit

For further information please contact timhyman@2twenty4consulting.com