**CHECKLIST 7 – Documentation**

Documentation of processing activities – requirements:

☐ If we are a controller for the personal data we process, we document all the applicable information under Article 30(1) of the GDPR.

☐ If we are a processor for the personal data we process, we document all the applicable information under Article 30(2) of the GDPR.

If we process special category or criminal conviction and offence data, we document:

☐ the condition for processing we rely on in the Data Protection Bill;

☐ the lawful basis for our processing; and

☐ whether we retain and erase the personal data in accordance with our policy document.

☐ We document our processing activities in writing.

☐ We document our processing activities in a granular way with meaningful links between the different pieces of information.

☐ We conduct regular reviews of the personal data we process and update our documentation accordingly.

Documentation of processing activities – best practice

When preparing to document our processing activities we:

☐ do information audits to find out what personal data our organisation holds;

☐ distribute questionnaires and talk to staff across the organisation to get a more complete picture of our processing activities; and

☐ review our policies, procedures, contracts and agreements to address areas such as retention, security and data sharing.

As part of our record of processing activities we document, or link to documentation, on:

☐ information required for privacy notices;

☐ records of consent;

☐ controller-processor contracts;

☐ the location of personal data;

☐ Data Protection Impact Assessment reports; and

☐ records of personal data breaches.

☐ We document our processing activities in electronic form so we can add, remove and amend information easily.