Information Asset Registry

Client	Everest Limited	Data Asset	CSS - Customer Data
Entry Date	27/03/2019	Data Code	D0B152D5-D682-4CF3-9521-
			[X] Controller [ ] Processor

Data Subject	Customers	Process Purpose	SERVICE DELIVERY - To provide our services to clients

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details   LIA Name

Retention Period	15 years	Runs From	date installation finalised	Buffer

Business Area	Customer Engagement	Measures to ensure accuracy	N/A
Person responsible for data asset	Branch Managers / Installation Managers	Data Source	Internally input by staff member
Approx. No of Records	TBA	Storage State	Data in database structure
Approx. No of Data Subjects	TBA	Storage Physical Location	Client's address in both locked office and

Access [X] All staff [ ] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[ ] Access controls
[ ] Backups
[ ] Data segregation
[ ] Encryption
[ ] Physical access controls

[ ] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access

Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	N/A
Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	4
Risk rating 1 to 25	4

Data Item

[ ] Appearance and size
[ ] Attendance and leave records
[ ] Authentication questions or answers
[ ] Commencement / termination dates
[ ] Contractual requirements
[ ] Correspondence including statements of opinion or intent
[ ] Criminal record checks / details (S)
[ ] Date of Birth
[ ] Details of payments or deductions
[ ] Employer/s name/s
[ ] Employment benefits (e.g. pension, etc)
[ ] Employment History
[X] Expressions of opinions regarding data subject
[X] Financial information

[ ] Gender
[ ] Genetic or biometric information (S)
[ ] Health or Medical Data (S)
[ ] ID documents (e.g. passport, driving licence)
[ ] IP Address
[ ] IT system usage records
[ ] Location Data
[ ] Marital status
[X] Names
[ ] Nationality, race or ethnicity (S)
[X] Notes biographical in nature
[ ] Payroll, tax and NICs information
[X] Personal contact details

[ ] Photographs
[ ] Pregnancy / maternity records
[ ] Recruitment records
[ ] References
[ ] Right to work information
[ ] Sickness absence records (S)
[X] Signature
[ ] Social media ID and related info
[ ] Trade union membership (S)
[ ] Unique identifier number or code
[ ] Usernames and passwords
[ ] Work contact details
[ ] Working hours

Notes	(i) contains sales agreement, (ii) survey, (iii) service issues during warranty period	Document
Advice Notes	(i) data would be better protected when segregated with user access controls, (ii) print controlls, (iii) export controlls, (iv) recommend expressions of opinion are kept clean for access fulfilment purposes	

Instructions required [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	E Financials (Suppliers who are companies)
Entry Date	24/03/2019	Data Code	79206911-3A2A-45C1-A2C4
			[X] Controller [ ] Processor

Data Subject	Suppliers and Contractors	Process Purpose	PAYMENTS - For the purposes of payments or refunds

Legal Basis [ ] Legal Requirement [X] Contractual Necessity [ ] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details   LIA Name

Retention Period	6 years	Runs From	Date created	Buffer

Business Area	Supplier Engagement	Measures to ensure accuracy	User-reliant update
Person responsible for data asset	Andrew Burnett	Data Source	Business partner or client
Approx. No of Records	TBA	Storage State	Data in database structure
Approx. No of Data Subjects	TBA	Storage Physical Location	In known multiple cloud server locations

Access [ ] All staff [X] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[X] Access controls
[ ] Backups
[ ] Data segregation
[X] Encryption
[ ] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access	? Cloud hosting company ?
Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	2
Breach risk severity 1 to 5	2
Risk rating 1 to 25	4

Data Item

[ ] Appearance and size	[ ] Gender	[ ] Photographs
[ ] Attendance and leave records	[ ] Genetic or biometric information (S)	[ ] Pregnancy / maternity records
[ ] Authentication questions or answers	[ ] Health or Medical Data (S)	[ ] Recruitment records
[ ] Commencement / termination dates	[ ] ID documents (e.g. passport, driving licence)	[ ] References
[ ] Contractual requirements	[ ] IP Address	[ ] Right to work information
[ ] Correspondence including statements of opinion or intent	[ ] IT system usage records	[ ] Sickness absence records (S)
[ ] Criminal record checks / details (S)	[ ] Location Data	[ ] Signature
[ ] Date of Birth	[ ] Marital status	[ ] Social media ID and related info
[ ] Details of payments or deductions	[X] Names	[ ] Trade union membership (S)
[ ] Employer/s name/s	[ ] Nationality, race or ethnicity (S)	[ ] Unique identifier number or code
[ ] Employment benefits (e.g. pension, etc)	[ ] Notes biographical in nature	[ ] Usernames and passwords
[ ] Employment History	[ ] Payroll, tax and NICs information	[ ] Work contact details
[ ] Expressions of opinions regarding data subject	[X] Personal contact details	[ ] Working hours
[ ] Financial information		

Notes   Document

Advice Notes   (i) Nikki: who hosts this? (ii) check article 28 terms, (iii) what security do they operate? (iv) approx. how many suppliers who are companies?

Instructions required   [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	E Financials (Suppliers who are individuals)
Entry Date	27/03/2019	Data Code	79206911-3A2A-45C1-A2C4
			[X] Controller [ ] Processor

Data Subject	Suppliers and Contractors	Process Purpose	PAYMENTS - For the purposes of payments or refunds

Legal Basis [ ] Legal Requirement [X] Contractual Necessity [ ] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details   LIA Name

Retention Period	6 years	Runs From Date created	Buffer

Business Area	Supplier Engagement	Measures to ensure accuracy User-reliant update
Person responsible for data asset	Andrew Burnett	Data Source Business partner or client
Approx. No of Records TBA		Storage State Data in database structure
Approx. No of Data Subjects TBA		Storage Physical Location In known multiple cloud server locations

Access [ ] All staff [X] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[X] Access controls
[ ] Backups
[ ] Data segregation
[X] Encryption
[ ] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access	? Cloud hosting company ?
Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	2
Breach risk severity 1 to 5	3
Risk rating 1 to 25	6

Data Item

[ ] Appearance and size
[ ] Attendance and leave records
[ ] Authentication questions or answers
[ ] Commencement / termination dates
[X] Contractual requirements
[ ] Correspondence including statements of opinion or intent
[ ] Criminal record checks / details (S)
[ ] Date of Birth
[ ] Details of payments or deductions
[ ] Employer/s name/s
[ ] Employment benefits (e.g. pension, etc)
[ ] Employment History
[ ] Expressions of opinions regarding data subject
[X] Financial information

[ ] Gender
[ ] Genetic or biometric information (S)
[ ] Health or Medical Data (S)
[ ] ID documents (e.g. passport, driving licence)
[ ] IP Address
[ ] IT system usage records
[ ] Location Data
[ ] Marital status
[X] Names
[ ] Nationality, race or ethnicity (S)
[ ] Notes biographical in nature
[ ] Payroll, tax and NICs information
[X] Personal contact details

[ ] Photographs
[ ] Pregnancy / maternity records
[ ] Recruitment records
[ ] References
[ ] Right to work information
[ ] Sickness absence records (S)
[ ] Signature
[ ] Social media ID and related info
[ ] Trade union membership (S)
[X] Unique identifier number or code
[ ] Usernames and passwords
[X] Work contact details
[ ] Working hours

Notes	Document
Advice Notes	(i) Nikki: who hosts this? (ii) check article 28 terms, (iii) what security do they operate? (iv) approx. how many suppliers who are individuals?
Instructions required	[X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	CV (Unsuccessful Applicant)
Entry Date	24/03/2019	Data Code	57A748BD-006A-42AE-B370

[X] Controller [ ] Processor

Data Subject	EMPLOYEE	Process Purpose	RECRUITMENT - For the purposes of recruitment

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details

LIA Name Staff Application Documents

Retention Period	6 months	Runs From	Date created	Buffer n/a

Business Area	Human Resources	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of HR	Data Source	Data Subject directly
Approx. No of Records	1000	Storage State	Data in database structure
Approx. No of Data Subjects	1000	Storage Physical Location	Location other than client's address in both

Access [ ] All staff [ ] Staff need to know [ ] All management [X] Management need to know [ ] IT [X] HR [ ] Accounts

Security measures
[X] Access controls
[X] Backups
[ ] Data segregation
[ ] Encryption
[ ] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access External HR / Legal Advisors

Overseas transfer [ ] Yes [ ] No

GDPR Compliant Terms signed? Yes

Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	3
Risk rating 1 to 25	3

Data Item

[ ] Appearance and size	[ ] Gender	[ ] Photographs
[ ] Attendance and leave records	[ ] Genetic or biometric information (S)	[ ] Pregnancy / maternity records
[ ] Authentication questions or answers	[ ] Health or Medical Data (S)	[ ] Recruitment records
[ ] Commencement / termination dates	[ ] ID documents (e.g. passport, driving licence)	[X] References
[ ] Contractual requirements	[ ] IP Address	[ ] Right to work information
[ ] Correspondence including statements of opinion or intent	[ ] IT system usage records	[ ] Sickness absence records (S)
[ ] Criminal record checks / details (S)	[ ] Location Data	[ ] Signature
[ ] Date of Birth	[ ] Marital status	[ ] Social media ID and related info
[ ] Details of payments or deductions	[ ] Names [X]	[ ] Trade union membership (S)
[ ] Employer/s name/s	[ ] Nationality, race or ethnicity (S)	[ ] Unique identifier number or code
[ ] Employment benefits (e.g. pension, etc)	[X] Notes biographical in nature	[ ] Usernames and passwords
[X] Employment History	[ ] Payroll, tax and NICs information	[X] Work contact details
[ ] Expressions of opinions regarding data subject	[X] Personal contact details	[ ] Working hours
[ ] Financial information		

Notes	Article 14 (5) (a) Exception relied on in relation to Privacy Notice for Referee personal data	Document
Advice Notes		

Instructions required [ ] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	MS Office 365	
Entry Date	27/03/2019	Data Code	CE7EBDC3-3FB3-445A-A417	
			[X] Controller [ ] Processor	

Data Subject   All   **Process Purpose**   MANAGEMENT - To effectively manage our staff, their activities and our tangible assets

Legal Basis   [ ] Legal Requirement   [ ] Contractual Necessity   [X] Legitimate Interest   [ ] Consent   [ ] Vital Interest   [ ] Public Function

Legal Requirement Details   **LIA Name**   Email Correspondance

Retention Period   6 months   **Runs From**   Date created   **Buffer**

Business Area	All	Measures to ensure accuracy	N/A	
Person responsible for data asset	Head of IT	Data Source	Various	
Approx. No of Records	TBA	Storage State	Data in database structure	
Approx. No of Data Subjects	TBA	Storage Physical Location	In known multiple cloud server locations	

Access   [X] All staff   [ ] Staff need to know   [ ] All management   [ ] Management need to know   [X] IT   [ ] HR   [ ] Accounts

Security measures

[ ] Access controls   [X] System access controls

[X] Backups   [ ] Tranfer controls

[ ] Data segregation   [ ] Two Factor Authentication

[X] Encryption   [ ] User input controls

[X] Physical access controls

List other organisations or individuals who access	Microsoft
Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	Yes
Likelihood of breach 1 to 5	3
Breach risk severity 1 to 5	2
Risk rating 1 to 25	6

Data Item

[ ] Appearance and size		[ ] Photographs
[ ] Attendance and leave records	[ ] Gender	[ ] Pregnancy / maternity records
[ ] Authentication questions or answers	[ ] Genetic or biometric information (S)	[ ] Recruitment records
[ ] Commencement / termination dates	[ ] Health or Medical Data (S)	[ ] References
[ ] Contractual requirements	[ ] ID documents (e.g. passport, driving licence)	[ ] Right to work information
[X] Correspondence including statements of opinion or intent	[ ] IP Address	[ ] Sickness absence records (S)
[ ] Criminal record checks / details (S)	[ ] IT system usage records	[ ] Signature
[ ] Date of Birth	[ ] Location Data	[ ] Social media ID and related info
[ ] Details of payments or deductions	[ ] Marital status	[ ] Trade union membership (S)
[ ] Employer/s name/s	[X] Names	[ ] Unique identifier number or code
[ ] Employment benefits (e.g. pension, etc)	[ ] Nationality, race or ethnicity (S)	[ ] Usernames and passwords
[ ] Employment History	[X] Notes biographical in nature	[ ] Work contact details
[X] Expressions of opinions regarding data subject	[ ] Payroll, tax and NICs information	[ ] Working hours
[ ] Financial information	[X] Personal contact details	

Notes   **Document**

Advice Notes   (i) is retention period correct? (ii) how long is archive retained?

Instructions required   [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	Mobile Phone Handsets & Tablets
Entry Date	27/03/2019	Data Code	5ECA2BCD-388A-4A93-AEE7
			[X] Controller [ ] Processor

Data Subject	Employees and workers	Process Purpose	MANAGEMENT - To effectively manage our staff, their activities and our tangible assets

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details   LIA Name Email Correspondance

Retention Period	6 months	Runs From Date created	Buffer

Business Area	All	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of IT	Data Source	Various
Approx. No of Records	TBA	Storage State	Data in database structure
Approx. No of Data Subjects	TBA	Storage Physical Location	In unknown multiple cloud server locations

Access [X] All staff [ ] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[X] Access controls
[X] Backups
[ ] Data segregation
[ ] Encryption
[X] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access

Overseas transfer [ ] Yes [ ] No

GDPR Compliant Terms signed? N/A

Likelihood of breach 1 to 5	4
Breach risk severity 1 to 5	3
Risk rating 1 to 25	12

Data Item

[ ] Appearance and size	[ ] Gender	[ ] Photographs
[ ] Attendance and leave records	[ ] Genetic or biometric information (S)	[ ] Pregnancy / maternity records
[ ] Authentication questions or answers	[ ] Health or Medical Data (S)	[ ] Recruitment records
[ ] Commencement / termination dates	[ ] ID documents (e.g. passport, driving licence)	[ ] References
[ ] Contractual requirements	[ ] IP Address	[ ] Right to work information
[X] Correspondence including statements of opinion or intent	[ ] IT system usage records	[ ] Sickness absence records (S)
[ ] Criminal record checks / details (S)	[ ] Location Data	[ ] Signature
[ ] Date of Birth	[ ] Marital status	[ ] Social media ID and related info
[ ] Details of payments or deductions	[X] Names	[ ] Trade union membership (S)
[ ] Employer/s name/s	[ ] Nationality, race or ethnicity (S)	[ ] Unique identifier number or code
[ ] Employment benefits (e.g. pension, etc)	[X] Notes biographical in nature	[ ] Usernames and passwords
[ ] Employment History	[ ] Payroll, tax and NICs information	[ ] Work contact details
[X] Expressions of opinions regarding data subject	[X] Personal contact details	[ ] Working hours
[ ] Financial information		

Notes	Document
Advice Notes	(i) who is mobile phone provider?

Instructions required [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	Maher Bird Associates web domain database
Entry Date	28/03/2019	Data Code	893F79C4-9F23-47D0-ADA2
			[X] Controller [ ] Processor

Data Subject	Clients and their Employees	Process Purpose	MARKETING - To market to leads

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details   LIA Name

Retention Period	6 months	Runs From	Date created	Buffer

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	65000	Storage State	Data in database structure
Approx. No of Data Subjects	54000	Storage Physical Location	In known multiple cloud server locations

Access [ ] All staff [X] Staff need to know [ ] All management [X] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[X] Access controls
[X] Backups
[ ] Data segregation
[X] Encryption
[X] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access	Maher Bird Associates
Overseas transfer	[X] Yes [ ] No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	2
Breach risk severity 1 to 5	3
Risk rating 1 to 25	6

Data Item

[ ] Appearance and size
[ ] Attendance and leave records
[ ] Authentication questions or answers
[ ] Commencement / termination dates
[ ] Contractual requirements
[ ] Correspondence including statements of opinion or intent
[ ] Criminal record checks / details (S)
[ ] Date of Birth
[ ] Details of payments or deductions
[ ] Employer/s name/s
[ ] Employment benefits (e.g. pension, etc)
[ ] Employment History
[ ] Expressions of opinions regarding data subject
[ ] Financial information

[ ] Gender
[ ] Genetic or biometric information (S)
[ ] Health or Medical Data (S)
[ ] ID documents (e.g. passport, driving licence)
[ ] IP Address
[ ] IT system usage records
[ ] Location Data
[ ] Marital status
[X] Names
[ ] Nationality, race or ethnicity (S)
[ ] Notes biographical in nature
[ ] Payroll, tax and NICs information
[X] Personal contact details

[ ] Photographs
[ ] Pregnancy / maternity records
[ ] Recruitment records
[ ] References
[ ] Right to work information
[ ] Sickness absence records (S)
[ ] Signature
[ ] Social media ID and related info
[ ] Trade union membership (S)
[ ] Unique identifier number or code
[ ] Usernames and passwords
[ ] Work contact details
[ ] Working hours

Notes	Document
Advice Notes	(i) check article 28 terms in MBA contract, (ii)

Instructions required [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	ConnexOne Dialler
Entry Date	28/03/2019	Data Code	939A0329-F6C2-4C5A-9350-

[X] Controller [ ] Processor

Data Subject	Clients and their Employees	Process Purpose	MARKETING - To market to leads

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details LIA Name

Retention Period	6 months	Runs From	Date created	Buffer

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	65000	Storage State	Data in database structure
Approx. No of Data Subjects	54000	Storage Physical Location	In known multiple cloud server locations

Access [ ] All staff [X] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[ ] Access controls [ ] System access controls
[ ] Backups [ ] Tranfer controls
[ ] Data segregation [ ] Two Factor Authentication
[ ] Encryption [ ] User input controls
[ ] Physical access controls

List other organisations or individuals who access	ConnexOne Dialler
Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	2
Breach risk severity 1 to 5	3
Risk rating 1 to 25	6

Data Item

[ ] Appearance and size
[ ] Attendance and leave records
[ ] Authentication questions or answers
[ ] Commencement / termination dates
[ ] Contractual requirements
[ ] Correspondence including statements of opinion or intent
[ ] Criminal record checks / details (S)
[ ] Date of Birth
[ ] Details of payments or deductions
[ ] Employer/s name/s
[ ] Employment benefits (e.g. pension, etc)
[ ] Employment History
[ ] Expressions of opinions regarding data subject
[ ] Financial information

[ ] Gender
[ ] Genetic or biometric information (S)
[ ] Health or Medical Data (S)
[ ] ID documents (e.g. passport, driving licence)
[ ] IP Address
[ ] IT system usage records
[ ] Location Data
[ ] Marital status
[X] Names
[ ] Nationality, race or ethnicity (S)
[ ] Notes biographical in nature
[ ] Payroll, tax and NICs information
[X] Personal contact details

[ ] Photographs
[ ] Pregnancy / maternity records
[ ] Recruitment records
[ ] References
[ ] Right to work information
[ ] Sickness absence records (S)
[ ] Signature
[ ] Social media ID and related info
[ ] Trade union membership (S)
[ ] Unique identifier number or code
[ ] Usernames and passwords
[ ] Work contact details
[ ] Working hours

Notes	Document
Advice Notes	(i) check article 28 terms, (ii)
Instructions required	[X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	CSS Appointment (Lifetime Guarantee Converts to Customer)
Entry Date	28/03/2019	Data Code	E3AF1F64-061C-4C60-9355
			[X] Controller [ ] Processor

Data Subject	Clients and their Employees	Process Purpose	MARKETING - To market to leads

Legal Basis [ ] Legal Requirement [ ] Contractual Necessity [X] Legitimate Interest [ ] Consent [ ] Vital Interest [ ] Public Function

Legal Requirement Details

LIA Name *LEI re 25 years inc. impact on sales

Retention Period	25 years	Runs From	fitment date	Buffer	

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	2,000,000	Storage State	Data in database structure
Approx. No of Data Subjects	2,000,000	Storage Physical Location	Client's address in both locked office and

Access [X] All staff [ ] Staff need to know [ ] All management [ ] Management need to know [ ] IT [ ] HR [ ] Accounts

Security measures

[X] Access controls
[X] Backups
[ ] Data segregation
[ ] Encryption
[X] Physical access controls

[X] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] User input controls

List other organisations or individuals who access	Sales Consultants / Anaylin
Overseas transfer	[ ] Yes [ ] No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	2
Risk rating 1 to 25	2

Data Item

[ ] Appearance and size	[ ] Gender	[ ] Photographs
[ ] Attendance and leave records	[ ] Genetic or biometric information (S)	[ ] Pregnancy / maternity records
[ ] Authentication questions or answers	[ ] Health or Medical Data (S)	[ ] Recruitment records
[ ] Commencement / termination dates	[ ] ID documents (e.g. passport, driving licence)	[ ] References
[ ] Contractual requirements	[ ] IP Address	[ ] Right to work information
[ ] Correspondence including statements of opinion or intent	[ ] IT system usage records	[ ] Sickness absence records (S)
[ ] Criminal record checks / details (S)	[ ] Location Data	[ ] Signature
[ ] Date of Birth	[ ] Marital status	[ ] Social media ID and related info
[ ] Details of payments or deductions	[X] Names	[ ] Trade union membership (S)
[ ] Employer/s name/s	[ ] Nationality, race or ethnicity (S)	[ ] Unique identifier number or code
[ ] Employment benefits (e.g. pension, etc)	[ ] Notes biographical in nature	[ ] Usernames and passwords
[ ] Employment History	[ ] Payroll, tax and NICs information	[ ] Work contact details
[ ] Expressions of opinions regarding data subject	[X] Personal contact details	[ ] Working hours
[ ] Financial information		

Notes	Document
Advice Notes	(i) check article 28 terms , (ii) check numbers for records and data subjects

Instructions required [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	CSS Appointment (Prev. Enquiries)
Entry Date	28/03/2019	Data Code	E3AF1F64-061C-4C60-9355
			☐ Controller ☐ Processor

Data Subject	Clients and their Employees	Process Purpose	MARKETING - To market to leads

Legal Basis ☐ Legal Requirement ☐ Contractual Necessity ☒ Legitimate Interest ☐ Consent ☐ Vital Interest ☐ Public Function

Legal Requirement Details   LIA Name

Retention Period	3 years	Runs From	Date created	Buffer

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	2,000,000	Storage State	Data in database structure
Approx. No of Data Subjects	2,000,000	Storage Physical Location	Client's address in both locked office and

Access ☒ All staff ☐ Staff need to know ☐ All management ☐ Management need to know ☐ IT ☐ HR ☐ Accounts

Security measures
☒ Access controls
☒ Backups
☐ Data segregation
☐ Encryption
☒ Physical access controls

☒ System access controls
☐ Tranfer controls
☐ Two Factor Authentication
☐ User input controls

List other organisations or individuals who access	Sales Consultants / Anaylin
Overseas transfer	☐ Yes ☐ No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	2
Risk rating 1 to 25	2

Data Item

☐ Appearance and size
☐ Attendance and leave records
☐ Authentication questions or answers
☐ Commencement / termination dates
☐ Contractual requirements
☐ Correspondence including statements of opinion or intent
☐ Criminal record checks / details (S)
☐ Date of Birth
☐ Details of payments or deductions
☐ Employer/s name/s
☐ Employment benefits (e.g. pension, etc)
☐ Employment History
☐ Expressions of opinions regarding data subject
☐ Financial information

☐ Gender
☐ Genetic or biometric information (S)
☐ Health or Medical Data (S)
☐ ID documents (e.g. passport, driving licence)
☐ IP Address
☐ IT system usage records
☐ Location Data
☐ Marital status
☒ Names
☐ Nationality, race or ethnicity (S)
☒ Notes biographical in nature
☐ Payroll, tax and NICs information
☒ Personal contact details

☐ Photographs
☐ Pregnancy / maternity records
☐ Recruitment records
☐ References
☐ Right to work information
☐ Sickness absence records (S)
☐ Signature
☐ Social media ID and related info
☐ Trade union membership (S)
☐ Unique identifier number or code
☐ Usernames and passwords
☐ Work contact details
☐ Working hours

Notes	(i) understand this is not in place yet but is an aspiration and so included on this basis	Document
Advice Notes	(i) check article 28 terms , (ii) check numbers for records and data subjects, (iii) IT to arrange removal of records after 3 years from CSS	

Instructions required ☒ Yes

Information Asset Registry

Client	Everest Limited	Data Asset	CSS Sales Consultant Diary
Entry Date	28/03/2019	Data Code	E3AF1F64-061C-4C60-9355
			☒ Controller ☐ Processor

Data Subject	Clients and their Employees	Process Purpose	MARKETING - To market to leads

Legal Basis   ☐ Legal Requirement   ☐ Contractual Necessity   ☒ Legitimate Interest   ☐ Consent   ☐ Vital Interest   ☐ Public Function

Legal Requirement Details   LIA Name

Retention Period	TBA	Runs From	fitment date		Buffer

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	2,000,000	Storage State	Data in database structure
Approx. No of Data Subjects	2,000,000	Storage Physical Location	Client's address in both locked office and

Access   ☒ All staff   ☐ Staff need to know   ☐ All management   ☐ Management need to know   ☐ IT   ☐ HR   ☐ Accounts

Security measures

☒ Access controls   ☒ System access controls
☒ Backups   ☐ Tranfer controls
☐ Data segregation   ☐ Two Factor Authentication
☐ Encryption   ☐ User input controls
☒ Physical access controls

List other organisations or individuals who access	Sales Consultants
Overseas transfer	☐ Yes ☐ No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	1
Risk rating 1 to 25	1

Data Item

☐ Appearance and size	☐ Gender	☐ Photographs
☐ Attendance and leave records	☐ Genetic or biometric information (S)	☐ Pregnancy / maternity records
☐ Authentication questions or answers	☐ Health or Medical Data (S)	☐ Recruitment records
☐ Commencement / termination dates	☐ ID documents (e.g. passport, driving licence)	☐ References
☐ Contractual requirements	☐ IP Address	☐ Right to work information
☐ Correspondence including statements of opinion or intent	☐ IT system usage records	☐ Sickness absence records (S)
☐ Criminal record checks / details (S)	☐ Location Data	☐ Signature
☐ Date of Birth	☐ Marital status	☐ Social media ID and related info
☐ Details of payments or deductions	☒ Names	☐ Trade union membership (S)
☐ Employer/s name/s	☐ Nationality, race or ethnicity (S)	☐ Unique identifier number or code
☐ Employment benefits (e.g. pension, etc)	☐ Notes biographical in nature	☐ Usernames and passwords
☐ Employment History	☐ Payroll, tax and NICs information	☐ Work contact details
☐ Expressions of opinions regarding data subject	☒ Personal contact details	☐ Working hours
☐ Financial information		

Notes	Document
Advice Notes	(i) check article 28 terms , (ii) check numbers for records and data subjects (iii) check how long data is available to Sales Consultants
Instructions required	☒ Yes

Information Asset Registry

Client	Everest Limited		Data Asset	Dialler Database
Entry Date	28/03/2019		Data Code	939A0329-F6C2-4C5A-9350-
				[X] Controller ☐ Processor

Data Subject   Clients and their Employees   Process Purpose   MARKETING - To market to leads

Legal Basis   ☐ Legal Requirement ☐ Contractual Necessity [X] Legitimate Interest ☐ Consent ☐ Vital Interest ☐ Public Function

Legal Requirement Details   LIA Name

Retention Period   6 months   Runs From   Date created   Buffer

Business Area	Marketing	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of Marking	Data Source	Data Subject directly
Approx. No of Records	65000	Storage State	Data in database structure
Approx. No of Data Subjects	54000	Storage Physical Location	In known multiple cloud server locations

Access   ☐ All staff [X] Staff need to know ☐ All management ☐ Management need to know ☐ IT ☐ HR ☐ Accounts

Security measures

☐ Access controls

☐ Backups   ☐ System access controls

☐ Data segregation   ☐ Tranfer controls

☐ Encryption   ☐ Two Factor Authentication

☐ Physical access controls   ☐ User input controls

List other organisations or individuals who access	ConnexOne Dialler
Overseas transfer	☐ Yes ☐ No
GDPR Compliant Terms signed?	TBA
Likelihood of breach 1 to 5	1
Breach risk severity 1 to 5	3
Risk rating 1 to 25	3

Data Item

☐ Appearance and size

☐ Attendance and leave records

☐ Authentication questions or answers

☐ Commencement / termination dates

☐ Contractual requirements

☐ Correspondence including statements of opinion or intent

☐ Criminal record checks / details (S)

☐ Date of Birth

☐ Details of payments or deductions

☐ Employer/s name/s

☐ Employment benefits (e.g. pension, etc)

☐ Employment History

☐ Expressions of opinions regarding data subject

☐ Financial information

☐ Gender

☐ Genetic or biometric information (S)

☐ Health or Medical Data (S)

☐ ID documents (e.g. passport, driving licence)

☐ IP Address

☐ IT system usage records

☐ Location Data

☐ Marital status

[X] Names

☐ Nationality, race or ethnicity (S)

☐ Notes biographical in nature

☐ Payroll, tax and NICs information

[X] Personal contact details

☐ Photographs

☐ Pregnancy / maternity records

☐ Recruitment records

☐ References

☐ Right to work information

☐ Sickness absence records (S)

☐ Signature

☐ Social media ID and related info

☐ Trade union membership (S)

☐ Unique identifier number or code

☐ Usernames and passwords

☐ Work contact details

☐ Working hours

Notes   Document

Advice Notes   (i) check article 28 terms, (ii)

Instructions required   [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	Recruitment Request Form
Entry Date	17/06/2019	Data Code	A4885DAA-2D22-44DF-8141
			X Controller ☐ Processor

Data Subject	Employees and workers	Process Purpose	HUMAN RESOURCES - To process personnel matters including appraisal, professional

Legal Basis   ☐ Legal Requirement   ☐ Contractual Necessity   **X** Legitimate Interest   ☐ Consent   ☐ Vital Interest   ☐ Public Function

Legal Requirement Details		LIA Name	Administration of employment

Retention Period	TBA	Runs From	TBA	Buffer	TBA

Business Area	Human Resources	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of HR	Data Source	Internally input by staff member
Approx. No of Records		Storage State	Data in database structure
Approx. No of Data Subjects		Storage Physical Location	TBA

Access   ☐ All staff   ☐ Staff need to know   ☐ All management   **X** Management need to know   ☐ IT   **X** HR   ☐ Accounts

Security measures
☐ Access controls
☐ Backups
☐ Data segregation
☐ Encryption
☐ Physical access controls

☐ System access controls
☐ Tranfer controls
☐ Two Factor Authentication
☐ User input controls

List other organisations or individuals who access

Overseas transfer	☐ Yes	☐ No
GDPR Compliant Terms signed?		
Likelihood of breach 1 to 5	1	
Breach risk severity 1 to 5	1	
Risk rating 1 to 25	1	

Data Item

☐ Appearance and size
☐ Attendance and leave records
☐ Authentication questions or answers
X Commencement / termination dates
X Contractual requirements
☐ Correspondence including statements of opinion or intent
☐ Criminal record checks / details (S)
☐ Date of Birth
☐ Details of payments or deductions
☐ Employer/s name/s
☐ Employment benefits (e.g. pension, etc)
☐ Employment History
☐ Expressions of opinions regarding data subject
X Financial information

☐ Gender
☐ Genetic or biometric information (S)
☐ Health or Medical Data (S)
☐ ID documents (e.g. passport, driving licence)
☐ IP Address
☐ IT system usage records
☐ Location Data
☐ Marital status
☐ Names
☐ Nationality, race or ethnicity (S)
☐ Notes biographical in nature
☐ Payroll, tax and NICs information
☐ Personal contact details

☐ Photographs
☐ Pregnancy / maternity records
☐ Recruitment records
☐ References
☐ Right to work information
☐ Sickness absence records (S)
☐ Signature
☐ Social media ID and related info
☐ Trade union membership (S)
☐ Unique identifier number or code
☐ Usernames and passwords
☐ Work contact details
X Working hours

Notes	
Advice Notes	(i) this record does not seem to contain any personal data; can it be linked to an individual when recruitment has taken place?
	Document
Instructions required	**X** Yes

Information Asset Registry

Client	Everest Limited	Data Asset	Payroll and Position Change Form
Entry Date	17/06/2019	Data Code	E8686383-68CA-43B1-908C
			[X] Controller ☐ Processor

Data Subject	Employees and workers	Process Purpose	HUMAN RESOURCES - To process personnel matters including appraisal, professional

Legal Basis ☐ Legal Requirement ☐ Contractual Necessity **[X]** Legitimate Interest ☐ Consent ☐ Vital Interest ☐ Public Function

Legal Requirement Details   LIA Name   Administration of employment

Retention Period	TBA	Runs From	TBA	Buffer	TBA

Business Area	Human Resources	Measures to ensure accuracy	N/A
Person responsible for data asset	Head of HR	Data Source	Internally input by staff member
Approx. No of Records	TBA	Storage State	Data in database structure
Approx. No of Data Subjects	TBA	Storage Physical Location	TBA

Access ☐ All staff ☐ Staff need to know ☐ All management ☐ Management need to know ☐ IT **[X]** HR ☐ Accounts

Security measures

☐ Access controls
☐ Backups
☐ Data segregation
☐ Encryption
☐ Physical access controls

☐ System access controls
☐ Tranfer controls
☐ Two Factor Authentication
☐ User input controls

List other organisations or individuals who access

Overseas transfer ☐ Yes ☐ No

GDPR Compliant Terms signed?

Likelihood of breach 1 to 5

Breach risk severity 1 to 5

Risk rating 1 to 25

Data Item

☐ Appearance and size
☐ Attendance and leave records
☐ Authentication questions or answers
☐ Commencement / termination dates
☐ Contractual requirements
☐ Correspondence including statements of opinion or intent
☐ Criminal record checks / details (S)
☐ Date of Birth
☐ Details of payments or deductions
☐ Employer/s name/s
☐ Employment benefits (e.g. pension, etc)
[X] Employment History
☐ Expressions of opinions regarding data subject
[X] Financial information

☐ Gender
☐ Genetic or biometric information (S)
☐ Health or Medical Data (S)
☐ ID documents (e.g. passport, driving licence)
☐ IP Address
☐ IT system usage records
☐ Location Data
☐ Marital status
[X] Names
☐ Nationality, race or ethnicity (S)
[X] Notes biographical in nature
☐ Payroll, tax and NICs information
☐ Personal contact details

☐ Photographs
☐ Pregnancy / maternity records
☐ Recruitment records
☐ References
☐ Right to work information
☐ Sickness absence records (S)
☐ Signature
☐ Social media ID and related info
☐ Trade union membership (S)
[X] Unique identifier number or code
☐ Usernames and passwords
☐ Work contact details
☐ Working hours

Notes

Advice Notes

Document

Instructions required **[X]** Yes