	Client Everest L	imited	Data Asset CS	S - Legal (which have	become a claim)		
Entry Date 28/03/2019			4D859-5AA5-4F59-A31C				
Data :	Subject Clients and their		s Purpose CLAIMS - To retain docume	_			
Lega	I Basis Legal Requirer  Legal Requirement	_	■ Legitimate Interest		blic Function		
	Logar Roquilonik		LIA Name				
Retention	Period 25 years		Runs From fitment date		Buffer		
	Business Area Legal		Measures to ensure accuracy	N/A			
Pers	son responsible for data asset Head of L	egal	Data Source	Data Subject dire	ectly		
	Approx. No of Record	ls 2,000	Storage State	Hard copy in ma	nual filing system		
	Approx. No of Data Subject	ts 2,000	Storage Physical Location	Location other th	an client's address in		
	Access All staff X	Staff need to know All mana	agement	☐ IT ☐ HR ☐ /	Accounts		
Security	Access controls			organisations or uals who access	Legal Advisors / Expert Witnesses		
measures	Backups	System access controls		Overseas transfer	☐ Yes ☐ No		
	☐ Data segregation	☐ Tranfer controls	GDPR Complia	ant Terms signed?	Yes		
	Encryption	Two Factor Authentication	Likelihoo	od of breach 1 to 5	1		
	V Physical access controls	User input controls	Breach i	risk severity 1 to 5	3		
	X Physical access controls	•	ı	Risk rating 1 to 25	3		
Data Item	Appearance and size		Gender	X Photog	raphs		
	Attendance and leave re	ecords			incy / maternity records		
	Authentication questions	s or answers	Genetic or biometric information (S)		ment records		
	Commencement / termin	nation dates	☐ Health or Medical Data (S)	Refere	nces		
			X ID documents (e.g. passport, driving	g licence)			
	X Contractual requirement	S	☐ IP Address	☐ Right to			
	X Correspondence including	ng statements of opinion or inten		Sickne			
	Criminal record checks /	details (S)	IT system usage records	✗ Signatu	ure		
	Date of Birth		Location Data	Social	media ID and related info		
			Marital status				
	★ Details of payments or d  ■ The state of the state	leductions	X Names	∐ Trade ι	union membership (S)		
	Employer/s name/s			Unique	identifier number or code		
	Employment benefits (e.	g. pension, etc)	Nationality, race or ethnicity (S)	Userna	mes and passwords		
	☐ Employment History		☐ Notes biographical in nature	□ Work c	ontact details		
			Payroll, tax and NICs information				
	<ul><li>Expressions of opinions</li><li>Financial information</li></ul>	regarding data subject	X Personal contact details	Workin	g hours		
Notes		20 torma (ii) canaidar are dina la	agal agrapment for average with access and the	adudo ortialo 00 tarres	Document		
Advice Notes	(,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		egal agreement for expert witnesses and intention where service call raised near end		S, (III) I I IO		
Instructio requir							

	Client Everest	Limited		Data Asset	Hard Copy	File (which ha	ave become a claim)		
Entry Date 28/03/2019		Data Code 8E54D859-		9-5AA5-4F59-A31C er Processor					
	Subject Clients and thei  I Basis  Legal Require  Legal Requirem	ment	·			•	-		
	Legal Requiren	icht Details		LIAT	varie				
Retention	Period 6 years		Runs From	End of litigation prod	cess		Buffer		
	Business Area Legal		M	easures to ensure acc	uracy N/A				
Pers	on responsible for data asset	Legal		Data Sour	ce Dat	a Subject dire	ectly		
	Approx. No of Recor			Storage St	ate Ha	rd copy in mai	nual filing system		
	Approx. No of Data Subject	ets 2,000	;	Storage Physical Locat	ion Loc	ation other that	an client's address in		
	Access All staff	Staff need to know All mana	agement	Management need to	know 🗌 IT	☐ HR ☐ A	Accounts		
Security measures	<ul><li>☐ Access controls</li><li>☐ Backups</li></ul>	System access controls			other organis ndividuals who Overseas	o access	Legal Advisors / Ex  ☐ Yes ☐ No	pert Witnesses	
	☐ Data segregation	Tranfer controls		GDPR Co	ompliant Term	s signed?	Yes		
	Encryption	Two Factor Authentication		Lik	elihood of bre	ach 1 to 5	1		
	X Physical access contro	<ul><li>User input controls</li></ul>		Bro	each risk seve	erity 1 to 5 ng 1 to 25	3 3		
					Nisk rau				
Data Item	Appearance and size		Gender			X Photog	raphs		
	Attendance and leave r	ecords	Genetic	Genetic or biometric information (S)			ncy / maternity records		
	Authentication question	s or answers	☐ Health	or Medical Data (S)		Recruit	☐ Recruitment records ☐ References		
	Commencement / term	ination dates		. ,	dair iona linnanna				
	X Contractual requiremen	nts	▼ ID documents (e.g. passport, driving licence)			Right to work information			
	X Correspondence includ	ing statements of opinion or intent	☐ IP Addr t	ess		Sickness absence records (S)			
	Criminal record checks	/ details (S)	☐ IT syste	em usage records		X Signatu	▼ Signature		
	Date of Birth	• •	Locatio	n Data			media ID and related inf	·o	
	X Details of payments or	deductions	Marital	status			union membership (S)		
		acadonono	x Names				, , ,	do	
	Employer/s name/s		Nationa	lity, race or ethnicity (S	3)		identifier number or coo	Je	
	Employment benefits (	e.g. pension, etc)	☐ Notes b	oiographical in nature		Userna	mes and passwords		
	Employment History	☐ Pavroll.	tax and NICs informat	ion	Work co	Work contact details			
	Expressions of opinions	s regarding data subject		Payroll, tax and NICs information      Personal contact details			g hours		
	X Financial information								
Notes	<b>S</b>						D	ocument	
Advice Notes	(,, ),,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	28 terms, (ii) consider creating le	egal agreeme	nt for expert witnesses	and include a	rticle 28 terms	s		
Instructio requir									

	Client	Everest Lim	ited		Data Asset	t F	itters Public I	Liability Insu	ırance	
Entry Date 28/03/2019					23EF-7ADA-4803-8CD9  ntroller Processor					
Data S	Subject	Suppliers and Cont	ractors Process	Purpose	CONTRACT -	To ensure of	other parties	perform the	ir contracted duties	
Legal	Basis	Legal Requirement	nt X Contractual Necessity	Legitima	te Interest	Consent [	Vital Intere	est 🗌 Pub	lic Function	
		Legal Requirement	Details			LIA Nan	me			
Retention	Period	25 years	F	Runs From	fitment date	•			Buffer	
E	Business	Area Legal		N	Measures to ens	sure accura	cy User-r	eliant updat	e	
	on respo	Head of Led	al		Da	ata Source	Data S	Subject dired	etly	
	Ар	prox. No of Records	TBA		Sto	orage State	Hard	copy in mar	nual filing system	
	Approx.	No of Data Subjects	TBA		Storage Physic	cal Location	Client'	s address ir	n both locked office and	
,	Access	All staff St	aff need to know   All mana	gement	Management	need to kno	ow IT	HR A	ccounts	
Security	Access controls						er organisatio			
measures	□ Backı	System access controls  Backups  Tranfer controls				man	Overseas tr		☐ Yes ☐ No	
					GDPR Compliant Term				N/A	
	Data	segregation	Two Factor Authentication			JDI IX COMP		signed:	IV/A	
	Encry	ption				Likelih	ood of breacl	h 1 to 5	1	
	☐ Physi	cal access controls	User input controls			Breac	ch risk severit		1	
							Risk rating	1 to 25	1	
Data Item	Appe	arance and size		Gende	r			Photogr	raphs	
	Atten	Attendance and leave records			Gerider			Pregnar	ncy / maternity records	
	Authe	entication questions o	r answers	Genetic or biometric information (S)			(S)	Recruitr	ment records	
		·	oment / termination dates		Health or Medical Data (S)					
	_ Comr	Commencement / termination dates			☐ ID documents (e.g. passport, driving licence			Referen	ices	
	Contr	actual requirements		☐ IP Address ☐ IT system usage records				Right to work information		
	Corre	spondence including	statements of opinion or intent					<ul><li>☐ Sickness absence records (S)</li><li>☐ Signature</li></ul>		
	Crimi	nal record checks / de	etails (S)							
			. ,	Location	on Data					
	Date	of Birth		Marital	status			_ Social II	nedia ID and related info	
	Detai	ls of payments or ded	uctions	x Names	3			Trade u	nion membership (S)	
	Emplo	oyer/s name/s						Unique	identifier number or code	
	Emple	oyment benefits (e.g.	pension, etc)	Nation	ality, race or eth	hnicity (S)		Usernar	mes and passwords	
				Notes	biographical in	nature		V Work on	entant dataila	
		Employment History  Expressions of opinions regarding data subject			, tax and NICs	information		X WOIK CC	ontact details	
					▼ Personal contact details			Working	g hours	
	Finan	cial information								
Notes	i								Document	
Advice Notes	<b>!</b>	(i) business centre	s have files for each subcontra	ct which will	contain a copy	of the publ	lic liability insu	urance certi		
Instructior require		X Yes								

	Client	Everest Lir	nited	Data	a Asset	Credit Control	Checks			
Ent	try Date	28/03/2019		Data Code		75441D5E-485E-4461-AFA2-				
					<b>&gt;</b>	Controller [	Processo	or		
Data S	Subject	Clients and their E	Employees Process	Purpose CREDIT	CHECKS - To v	et for creditwo	orthiness			
Legal	l Basis	Legal Requirem	ent  Contractual Necessity	X Legitimate Interes	st Consent	☐ Vital Intere	est Pub	lic Function		
		Legal Requiremer	nt Details		LIA Na	me				
Retention	n Period	2 years	F	Runs From Date	created			Buffer +	6 months	
	Business	Area Legal		Measures	to ensure accura	acy N/A				
Pers	son respor for data		gal		Data Source	Data S	Subject direc	etly		
	Ар	prox. No of Records	500		Storage State	e Hard	copy in man	ual filing sy	stem	
	Approx.	No of Data Subjects	500	Storage	Physical Location	n Client'	s address ir	locked offi	ce	
	Access	All staff X S	Staff need to know 🔲 All manag	gement 🗌 Manage	ement need to kn	ow 🗌 IT 📗	HR A	ccounts		
Security	Acces	ss controls				her organisation				
measures	☐ Backı	ups	System access controls	Overseas				Yes	□ No	
			Tranfer controls		GDPR Com	pliant Terms s	signed?	N/A		
		segregation	☐ Two Factor Authentication							
	Encry	ption	Likelihood of brea Breach risk sever				1 4			
	X Physi	cal access controls	User input controls		Diea	Risk rating		4		
Data Item	Appea	arance and size		X Gender			Photogra	aphs		
	Attend	dance and leave red				Pregnan	ncy / matern	ity records		
	Authe	entication questions	or answers	Genetic or biometric information (S)			Recruitn	nent records	3	
	Comn	mencement / termina	Health or Medical Data (S)			Referen	ces			
				☐ ID documents (e.g. passport, driving licence)						
		actual requirements		☐ IP Address		Right to work information				
	Corre	spondence including	g statements of opinion or intent			Sickness absence records (S)		ecords (S)		
	Crimin	nal record checks / o	details (S)	IT system usage records			Signature			
	X Date	of Birth		Location Data			Social m	nedia ID and	I related info	
	□ Dotail	ls of payments or do	ductions	☐ Marital status			□ Trade III	nion membe	archin (S)	
	Detail	ls of payments or de	ductions	X Names			Haue ui	mon membe	15111p (3)	
	Emplo	oyer/s name/s		Nationality, race	e or ethnicity (S)		Unique i	dentifier nu	mber or code	
	Emplo	oyment benefits (e.g	. pension, etc)				Usernan	nes and pas	sswords	
	☐ Emplo	oyment History		Notes biograph	ical in nature		☐ Work co	ntact details	3	
	□ Evpro	ossions of opinions r	Payroll, tax and	NICs information	1	□ Working	houre			
		·	of opinions regarding data subject		X Personal contact details			hours		
	X Finan	cial information								
Notes	6								Documen	ıt
Advice Notes										
Instructio requir		Yes								

	Client	Everest	Limited			Data Asset		Access Requ	est Files		
Entry Date 28/03/2019				9B075101-7F Controller	3075101-7F7A-46A1-8C7B  Controller Processor						
Data	Subject	All		Proces	s Purpose	LAWFUL - To e	ensure ou	r activities are	e within the	law	
Lega	l Basis	Legal Require	ment [] (	Contractual Necessity	X Legitimat	e Interest	Consent	☐ Vital Inter	est 🗌 Pul	blic Function	
_		Legal Requirem	nent Details	TBA			LIA Na	ame			
Retention	n Period	6 months			Runs From	Date reques	t fulfilled			Buffer	
	Business	s Area Custome	er Relations	;	М	leasures to ens	ure accur	acy N/A			
Pers	son respo for data		Legal			Da	ata Source	e Vario	us		
		prox. No of Recor	ds 1	00		Sto	orage State	e Hard	copy in ma	nual filing system	
	Approx.	No of Data Subject	cts 1	00	;	Storage Physica	al Location	n Clien	t's address	in locked cabinet	
	Access	All staff	Staff need	d to know 🔲 All mana	agement	Management n	need to kn	ow 🗌 IT	HR .	Accounts	
Security	Acce	ss controls						her organisat			
measures	Backups		Syst	em access controls					eas transfer		
				Tranfer controls		GDPR Compliant Teri					
	Data	segregation	☐ Two Factor Authentication								
	Encry	/ption		input controls				hood of bread		1	
	X Physi	ical access control		input controls			Brea	ch risk severi Risk rating	-	4	
								r don rading			
Data Item	Appe	arance and size			Gender	-			Photog	raphs	
	Atten	<ul> <li>□ Attendance and leave records</li> <li>□ Authentication questions or answers</li> <li>□ Commencement / termination dates</li> </ul>			☐ Genetic or biometric information (S) ☐ Health or Medical Data (S)			(8)	Pregna	ancy / maternity reco	ords
	Authe							(5)	Recruit	ment records	
	☐ Comr								Refere	nces	
				-	☐ ID documents (e.g. passport, driving licence				·		
	_ Contr	Contractual requirements  Correspondence including statements of opinion or intent  Criminal record checks / details (S)			☐ IT system usage records				<ul><li>☐ Right to work information</li><li>☐ Sickness absence records (S)</li></ul>		
	Corre										(S)
	Crimi								Signatu	ure	
	_ Date	of Birth			Locatio	n Data			Social	media ID and relate	d info
	□ Detai	ls of payments or	deductions		Marital	status			☐ Trade ı	union membership (	S)
			acadonono		Names						
	Empl	oyer/s name/s			Nationa	ality, race or eth	nicity (S)		Unique	identifier number o	r code
	_ Empl	oyment benefits (e	g. pensior	n, etc)	Notes h	piographical in n	naturo		Userna	mes and password	S
<ul><li>☐ Employment History</li><li>☐ Expressions of opinions regarding data subject</li></ul>				oiographical in n			☐ Work c	ontact details			
		☐ Payroll,	tax and NICs in	nformatio	n	Workin	g hours				
		ncial information	- 3	-	Person	al contact detail	ls			-	
Notes	e	(i) categories o	of nersonal	data are all that appear	in other data	a accete					Document
Notes Advice		(i) categories 0	ı hersongi (	data are all that appear	m omer data	1 000010					Document
Notes											
Instructio requir		x Yes									

	Client	Everest Limited	Data Asset Da	ta Access Log Sheet		
Entry Date 28/03/2019		Data Code C0	B9F517-2982-4CE1-9F	9F517-2982-4CE1-9FF4-		
			x (	Controller	or	
Data S	Subject All	Process	s Purpose LAWFUL - To ensure our a	ctivities are within the la	aw	
Legal	Basis Lega	Requirement	X Legitimate Interest	Vital Interest	lic Function	
	Legal	Requirement Details TBA	LIA Name	е		
Retention	Period 6 mon	nths	Runs From Date request fulfilled		Buffer	
	Business Area	Customer Relations	Measures to ensure accuracy	/ User-reliant updat	te	
Pers	on responsible for data asset	Head of Legal	Data Source	Various		
	Approx. No	of Records 1	Storage State	Hard copy in man	nual filing system	
	Approx. No of Da	ata Subjects 100	Storage Physical Location	Client's address in	n locked office	
	Access Al	ll staff   Staff need to know   All mana	gement	IT HR A	ccounts	
Security	Access contro	ls		r organisations or duals who access		
measures	Backups	System access controls		Overseas transfer	Yes No	
		Tranfer controls	GDPR Compli	ant Terms signed?	N/A	
	Data segregat	☐ Two Factor Authentication	,			
	Encryption	User input controls		od of breach 1 to 5	1	
	Physical acces			risk severity 1 to 5	2	
				Risk rating 1 to 25	2	
Data Item	Appearance a	nd size	Gender	Photogr	raphs	
	Attendance ar	nd leave records			ncy / maternity records	
	Authentication	questions or answers	Genetic or biometric information (S		ment records	
			☐ Health or Medical Data (S)	□ Defere		
	Commenceme	ent / termination dates	☐ ID documents (e.g. passport, drivin	Refereng licence)	ices	
	Contractual re	quirements	☐ IP Address	Right to	work information	
	Corresponden	ce including statements of opinion or intent		Sicknes	s absence records (S)	
	Criminal recor	d checks / details (S)	☐ IT system usage records	Signatu	re	
		•	Location Data	_		
	Date of Birth		☐ Marital status	Social in	nedia ID and related info	
	Details of payı	ments or deductions	X Names	Trade u	nion membership (S)	
	Employer/s na	ame/s		Unique	identifier number or code	
	Employment b	penefits (e.g. pension, etc)	Nationality, race or ethnicity (S)	Usernar	mes and passwords	
			☐ Notes biographical in nature		·	
	Employment H	nistory	Payroll, tax and NICs information	∐ Work co	ontact details	
	Expressions o	f opinions regarding data subject	X Personal contact details	☐ Working	hours	
	Financial infor	mation	A I CISOHAI COHLACE UCIAIIS			
_	_					
Notes Advice	.,,	sonal contact details is postcode only if no			Document	
Notes	(.)	nsfer to spreadsheet so that old data can be	: removed			
Instruction require		8				

	Client	Everest Limite	ed	Data Asset	Personal Injury Claims	
Entry Date 28/03/2019			4A3FA868-28EA-473D-			
Data	Subject	All	Process	Purpose CLAIMS - To retain docu		
Lega	l Basis	Legal Requirement	Contractual Necessity	X Legitimate Interest   Consent	☐ Vital Interest ☐ P	ublic Function
		Legal Requirement D	etails	LIA Na	me	
Retention	n Period	Duration of litigation	plus 6 years	Runs From Data litigation conclud	ed	Buffer
	Business	Area Legal		Measures to ensure accura	acy N/A	
Pers	son respor for data	Dead of Fedal		Data Source	e Various	
	Ар	prox. No of Records	100	Storage State	e Scanned copy	n electronic filing system
	Approx.	No of Data Subjects	100	Storage Physical Location	n Client's address	s in both locked office and
	Access	All staff X Staf	f need to know 🔲 All mana	gement	ow IT HR	Accounts
Security	× Acces	ss controls			her organisations or ividuals who access	Broker and relevant Insurer
measures	X Backı		System access controls		Overseas transfer	Yes No
			Tranfer controls	GDPR Com	pliant Terms signed?	ТВА
	X Data	segregation	Two Factor Authentication	33 33	phant round dignout	
	Encry	ption	User input controls		hood of breach 1 to 5	1
	X Physi	cal access controls	Oser input controls	Brea	ch risk severity 1 to 5	4
					Risk rating 1 to 25	4
Data Item	Appea	arance and size		Gender	Photo	graphs
	Attend	dance and leave record	s			ancy / maternity records
	Authe	entication questions or a	answers	Genetic or biometric information		itment records
	Comr	mencement / termination	n dates	X Health or Medical Data (S)	Refer	ances
	Com	nencement/termination	i dates	☐ ID documents (e.g. passport, dri		ences
	Contr	actual requirements		IP Address	Right	to work information
	Corre	spondence including st	atements of opinion or intent		Sickne	ess absence records (S)
	Crimi	nal record checks / deta	ails (S)	IT system usage records	Signa	ture
	X Date	of Rirth		Location Data	Socia	I media ID and related info
	A Date	OI BIITII		Marital status	Socia	Thedia iD and related into
	Detail	ls of payments or deduc	ctions	X Names	Trade	union membership (S)
	Emplo	oyer/s name/s			☐ Uniqu	e identifier number or code
	☐ Emplo	oyment benefits (e.g. pe	ension, etc)	Nationality, race or ethnicity (S)	Usern	ames and passwords
			. ,	X Notes biographical in nature		·
	X Emplo	oyment History		Payroll, tax and NICs information		contact details
	Expre	essions of opinions rega	ording data subject	X Personal contact details	Worki	ng hours
	Finan	cial information		1 Craomar contact details		
Notes Advice Notes	е	(i) this is on F: drive	on company server, (ii) these	go back many years		Document
Instructio requir		X Yes				

	Client	Everest Limite	ed	Data Asset	Customer Finance Co	omplaints and Compliance Files		
Ent	try Date	28/03/2019		Data Code	2AC3F1C-0C1C-4F5F-9759			
				Controller Prod	cessor			
		0		D. OLAMAO Ta salata da c		In control to the state of the		
Data S	Subject	Clients and their Emp	oloyees Process	s Purpose CLAIMS - To retain docu	iments that may be re	elevant to legal claims		
Legal	Basis	Legal Requirement	Contractual Necessity	X Legitimate Interest   Consent	☐ Vital Interest ☐	Public Function		
		Legal Requirement D	etails	LIA Na	ıme			
Retention	Period	TBA		Runs From		Buffer		
	Business	s Area Customer Rela	ations	Measures to ensure accura	acy N/A			
Pers	on respo	DEAU OI LEUAI		Data Source	e Data Subject	directly		
	for data Ar	pprox. No of Records	200	Storage State	Llord convin	manual filing system		
	_	No of Data Subjects	200	Storage Physical Location		ess in locked office		
		D All at a ff D Ot a f	7					
	Access	All staff X Staf	f need to know  All mana	gement  Management need to kn	ow IT HR	Accounts		
Security	Acce	ess controls			her organisations or			
measures			System access controls	ind	ividuals who access	Yes No		
	Back	ups	Tranfer controls		Overseas transfer			
	Data	segregation	Tura Factor Authoritication	GDPR Com	pliant Terms signed?	N/A		
	_ Encry	yption	Two Factor Authentication	Likeli	hood of breach 1 to 5	1		
	Phys	ical access controls	User input controls	Brea	ch risk severity 1 to 5	3		
		ical access controls			Risk rating 1 to 25	3		
Data Item	Appe	earance and size			☐ Pho	otographs		
	Atten	ndance and leave record	ls.	Gender	Pre	gnancy / maternity records		
				☐ Genetic or biometric information	(S)			
	Authe	entication questions or a	answers	Health or Medical Data (S)	Rec	cruitment records		
	Com	mencement / termination	n dates			ferences		
	Cont	ractual requirements		☐ ID documents (e.g. passport, dri	,	ht to work information		
	Corre	enondence including et	atements of opinion or intent	☐ IP Address	□ Sic	kness absence records (S)		
		espondence including st	atements of opinion of intent	☐ IT system usage records		kiless absence records (5)		
	Crimi	inal record checks / deta	ails (S)	Location Data	X Sig	nature		
	x Date	of Birth			Soc	cial media ID and related info		
	X Detai	ils of payments or deduc	ctions	Marital status	☐ Tra	de union membership (S)		
	□ Empl	loyer/s name/s		x Names	□ Uni	que identifier number or code		
		loyen's name/s		☐ Nationality, race or ethnicity (S)	0111	que identifier flumber of code		
	Empl	loyment benefits (e.g. pe	ension, etc)	■ Notes biographical in nature	Use	ernames and passwords		
	_ Empl	loyment History				rk contact details		
	Expre	essions of opinions rega	arding data subject	Payroll, tax and NICs information		rking hours		
			- ,	X Personal contact details		-		
	x Finar	ncial information						
Notes	;					Document		
Advice		(i) how long do we no	eed to retain this for?					
Notes	5							
Instruction require		X Yes						