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	☐ 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 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
[ ] 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	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		[ ] 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
[ ] 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	[ ] Notes biographical in nature	[ ] Work contact details
[ ] Expressions of opinions regarding data subject	[ ] Payroll, tax and NICs information	[ ] Working hours
[ ] Financial information	[X] Personal contact details	

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		[ ] 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
[ ] 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	[ ] Notes biographical in nature	[ ] Work contact details
[ ] Expressions of opinions regarding data subject	[ ] Payroll, tax and NICs information	[ ] Working hours
[ ] Financial information	[X] Personal contact details	

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   ☒ 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 / 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	☒ 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	(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

[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	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 [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
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
[ ] 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) check numbers for records and data subjects
(iii) check how long data is available to Sales Consultants

Instructions required   [X] Yes

Information Asset Registry

Client	Everest Limited	Data Asset	Supply Contract
Entry Date	28/03/2019	Data Code	F177874E-1582-4774-8432-

X Controller ☐ Processor

Data Subject	Clients and their Employees	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   ** LIA for 25 years ditto above **

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	TBA	Storage State	Hard copy in manual filing system
Approx. No of Data Subjects	TBA	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	EDM
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)
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		Document
Advice Notes	(i) how many docs ? (ii) article 28 terms for EDM, (iii) docs are scanned @ EDM then destroyed [DMC: check this with Sales Admin, Denise Whitby and Jade Snugg]	

Instructions required **X** 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
[ ] Data segregation
[ ] Encryption
[ ] Physical access controls

[ ] System access controls
[ ] Tranfer controls
[ ] Two Factor Authentication
[ ] 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	Photograph Permission Forms
Entry Date	28/03/2019	Data Code	5B068D9E-94DE-4E86-8709-

[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	15 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	500	Storage State	Hard copy in manual filing system
Approx. No of Data Subjects	500	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
[X] 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	1	
Risk rating 1 to 25	1	

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)
[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   Document

Advice Notes

Instructions required ☐ Yes