**Template data processing register**

This document provides a template processing register for [HES].

The General Data Protection Regulation includes an obligation for companies to keep a register of all processing activities. This register should be updated on a regular basis.

The register should include a number of items, listed in the GDPR. Upon request, the company must give the relevant data protection authority access to the data register.

This template should be filled out by describing a number of topics and data processing activities together with relevant elements such as what data is collected, for which purposes the data is processed and who will receive such data. It is advised to have the document completed by individuals responsible for the respective data processing activity/activities.

Please be advised that the data processing activities described in this document are generic, and that:

* some may not apply to all (in which case they can be deleted); and/or
* that some data processing activities are missing (in which case they should be added).

This template needs to be filled in for the various business functions within the company, such as: Human Resources, Finance, Sales, IT etc.

|  |  |
| --- | --- |
| 1. **[Business function]**[[1]](#footnote-1) | |
| 1. This form is completed by[[2]](#footnote-2): | |
| Name |  |
| Function |  |
| Email address |  |
| Company | [HES] |
| Address |  |
| 1. Purposes for which the data is processed[[3]](#footnote-3) | |
| […]  […]  **Other purposes for which the data are processed**   * […] * […]   *Please use this space to provide more information on the purposes for which data is processed.* | |
| 1. Data subjects | |
| Current employees  Former employees  Applicants  Customers  Suppliers of goods and services | |
| 1. Data categories that are processed[[4]](#footnote-4) | |
| Names, initials, titles  Gender  Date of birth  (Corporate) address, postcode, town and country of residence  Telephone  Email address  Other information necessary for communication: *Please complete if ticked*  Administration number / chamber of commerce / passport or driver license  Bank account number  Fiscal information: *Please complete if ticked*  Data about reported incidents, including details of claimant and other persons involved  Data which is necessary for compliance with mandatory legislation, being: *Please complete if ticked*  **Sensitive data**  Data concerning religion or philosophy of life: *Please complete if ticked*  Data concerning race or ethnicity : *Please complete if ticked*  Data concerning political persuasion : *Please complete if ticked*  Data concerning health : *Please complete if ticked*  Data concerning sexual life: *Please complete if ticked*  Data concerning trade union membership: *Please complete if ticked*  Data concerning criminal behaviour: *Please complete if ticked*  **Other data categories that are processed**   * […] * […]   *Please use this space to provide more information on data categories to the extent needed.* | |
| 1. The information above will be provided to, shared with or made available to (incl. 'having access to'): | |
| **Internal functions to which the data is provided**  HR  Legal  Finance  Management  Operations   * […] * […]   **External parties to which the data is provided (such as service providers)**   * […] * [National and international enforcement authorities] * [Insurance companies] * [Other entities to the extent needed for conducting research into reported incidents] | |
| 1. Data retention and storage limits[[5]](#footnote-5) | |
| *Please describe the policy and practice related to data retention and storage of the data described above.* | |
| 1. Data transfer | |
| The data can be accessed from, or is transferred to, outside of the European Economic Area or is stored or processed there  The data cannot be accessed from, and is not transferred, outside of the European Economic Area and is not stored or processed there  *Please use this space to provide more information on data transfers to the extent needed, including which safeguards are in place if the personal data is transferred outside the European Economic Area.* | |
| 1. Are the individuals asked for their consent for any of the above described use of their data? | |
| No  Yes, namely: *Please complete if ticked* | |
| 1. Which IT applications are used for the processing of this data? | |
| * […] * […]   *Please include a general description of the technical and organisational security measures.* | |

1. **Note**: please include the relevant business function in which the data processing activities (set out in the overview below) take place, such as HR, Finance, Sales, IT etc. [↑](#footnote-ref-1)
2. **Note**: please note that it is advised to have the document completed by individuals responsible for the respective data processing activity/activities for the relevant business function. [↑](#footnote-ref-2)
3. **Note**: Please include the purpose(s) of the processing activities in that particular business function. For example, relevant purposes for the business function HR could be recruitment, implementation of the employment agreement, employee/payroll records and whistleblowing purposes. Another example for finance purposes may be: Making payments; Collection of receivables; Assisting in the levying or collection of taxes (including municipal, provincial and other taxes); Calculating and documenting income and expenditure; Handling disputes and auditing; Maintaining contacts with debtors and creditors; and Compliance with mandatory legislation. [↑](#footnote-ref-3)
4. **Note**: Please note that the list in this section 3 only provides examples of data categories that could be processed in certain business functions. Other items should be included such as BSN numbers, CV's etc. For the avoidance of doubt, this is a non-exhaustive list and should be reviewed and amended for each relevant business function. [↑](#footnote-ref-4)
5. **Note**: You may consider to include a general reference to the HES Document Retention Policy, provided that the envisaged time limits for erasure of the different categories of data described in this document is covered in the HES Document Retention Policy. [↑](#footnote-ref-5)