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# Personal Data Protection Checklist

## ■ GUIDELINES AND PROCESSES ORGANIZATION

- Appoint responsible persons with the necessary authorization for the processes related to personal data
- Review current policies on personal data management for compliance with legal requirements and current business processes
- Post a personal data processing policy on your website
- Check availability of written consent from personal data subjects
- Organise the handling of personal data incidents
- Train employees to work with personal data and explain the rules for protection
- Identify required reports and deadlines for their submission to regulatory authorities

## ■ PERSONAL DATA COLLECTION

- Identify the sources of personal data collection and the format in which it is obtained
- Reduce the amount of collected information to the required minimum
- Formalise the process of obtaining personal data from the moment of generation (collection) to its placement in a secure storage location

## ■ DATA STORAGE AND PROCESSING

- Categorise personal data and storage methods
- Anonymise the data where possible (e.g., with a unique identifier)
- Segregate access rights (hard drive on server with clear access rights or archive room with limited physical access)
- Determine the nature of operations allowed to be performed with the data
- Register actions classified as critical (e.g., copying data not related to work tasks; data deletion)
- Define the rules for transferring personal data to third parties
- Limit data storage to the required minimum length of time
- Define the storage, archiving and deletion periods for personal data

## ■ HANDLING REQUESTS OF PERSONAL DATA SUBJECTS

- Set-up instructions on processing requests from personal data subjects
- Assign responsible persons and deadlines for the request fulfilment

## ■ INTERNAL CONTROLS AND INTERNAL AUDIT

- Identify the risks in the course of data processing
- Establish controls and determine their frequency
- Develop internal audit program and define periods for internal audits
- Document internal controls processes, as well as internal audits

**SCHNEIDER GROUP specialists are ready to assist you in implementing internal controls and conducting regular internal audits of personal data protection processes in your company.**

\* The provided checklist consists of basic elements for personal data protection. The list of required elements may vary depending on the specifics of the company and industry.