



## PRIVACY POLICY CHECKLIST (ART 13 & ART 14 GDPR)

The coloured columns represent new additional requirements under the GDPR.

Requirement		Tick
1.	Your identity and contact details.	
2.	Contact details of your data protection officer if you have one.[or details of the person nominated as the person responsible for data privacy if you do not have a DPO].	
3.	The purposes for processing the personal data collected e.g. for provision of recruitment services, finding suitable roles for candidates with clients and third parties.	
4.	Who the personal data is shared with internally and externally – for example clients.	
5.	Notification of intention to transfer the personal data outside of the European Economic Area (EEA), if applicable. (This is where data is to be transferred outside the EEA – for example to servers where you are hosting personal data or to clients who may be based in another territory).	
6.	<p>Where the personal data is transferred outside the EEA, information on the adequacy standards of the countries personal data will be transferred to, the safeguards implemented for the transfer, and the means by which a data subject can obtain a copy of the safeguards in place for such transfers.</p> <p>There are several appropriate safeguards available under GDPR:</p> <ul style="list-style-type: none"> <li>(i) The use of standard EU model clauses;</li> <li>(ii) Transfers to companies in the US who have a privacy shield certification;</li> <li>(iii) Transfers to countries that have a 'white list status'</li> <li>(iv) Companies that have binding corporate rules in place; and</li> <li>(v) Consent and certain other very narrow exemptions.</li> </ul> <p>You can found out more about these mechanisms and safeguards <a href="#">here</a>.</p>	
7.	How long the personal data will be stored for, or if that is not possible, the criteria used to determine how long the data will be stored for.	
8.	The existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability.	

9.	The existence of the new rights of data portability and the right to be forgotten.	
10.	The right of the data subject to withdraw consent to the processing of their personal data where the processing is based on consent.	
11.	The right to make a complaint to the data protection authority with regards to your processing of their personal data.	
12.	The existence of automated decision making including profiling, if any. Along with the logic behind such decision making and what such processing means for the data subject.	
13.	Information on whether the processing of the personal data is a legal or contractual requirement, or a requirement necessary to enter into a contract.	
14.	Information on whether the data subject is obliged to provide the personal data and the consequences of failing to provide this data.	
15.	The categories of personal data concerned	
16.	The legal basis of processing relied on by the Controller for the processing of the personal data.	
17.	<p>Where legitimate interest is relied on as a grounds for processing, details of the legitimate interest relied on.</p> <p>N.B – this would be where the activity is necessary for a business purpose but you would be required to undertake a balancing test as against the rights and potential risks to an individual. The Data Protection Network has prepared a template and guidance on legitimate interests that you can find at <a href="https://www.dpnetwork.org.uk/dpn-legitimate-interests-guidance/">https://www.dpnetwork.org.uk/dpn-legitimate-interests-guidance/</a></p>	
18.	The sources from which the personal data was collected and If applicable whether it came from a public source.	

