**Controller/Processor checklists**

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| --- | --- |
| **Date** |  |
| **Author** |  |
| **Team** |  |
| **Activity being reviewed** |  |

**Are we a Data Controller?**

☐ We decided to collect or process the personal data.

☐ We decided what the purpose or outcome of the processing was to be.

☐ We decided what personal data should be collected.

☐ We decided which individuals to collect personal data about.

☐ We obtain a commercial gain or other benefit from the processing, except for any payment for services from another controller.

☐ We are processing the personal data as a result of a contract between us and the data subject.

☐ The data subjects are our employees.

☐ We make decisions about the individuals concerned as part of or as a result of the processing.

☐ We exercise professional judgement in the processing of the personal data.

☐ We have a direct relationship with the data subjects.

☐ We have complete autonomy as to how the personal data is processed.

☐ We have appointed the processors to process the personal data on our behalf

**Are we a Joint Controller?**

☐ We have a common objective with others regarding the processing.

☐ We are processing the personal data for the same purpose as another controller.

☐ We are using the same set of personal data (eg one database) for this processing as another controller.

☐ We have designed this process with another controller.

☐ We have common information management rules with another controller

**Are we a Data Processor?**

☐ We are following instructions from someone else regarding the processing of personal data.

☐ We were given the personal data by a customer or similar third party, or told what data to collect.

☐ We do not decide to collect personal data from individuals.

☐ We do not decide what personal data should be collected from individuals.

☐ We do not decide the lawful basis for the use of that data.

☐ We do not decide what purpose or purposes the data will be used for.

☐ We do not decide whether to disclose the data, or to whom.

☐ We do not decide how long to retain the data.

☐ We may make some decisions on how data is processed, but implement these decisions under a contract with someone else.

☐ We are not interested in the end result of the processing