

**GDPR Mapper – Data Mapping Assistant**

**Version 1.00.00, ©2017, David Kinrade**

## Introduction

GDPR Mapper is the first in a suite of simple applications created to assist in the implementation of a G.D.P.R. (General Data Protection Regulations) framework suitable for a small business, charity or sole trader who is responsible for some data processing and retention that results in them having to be G.D.P.R. compliant.

GDPR Mapper assists in the creation of a comprehensive and informative Data Processing Map, a series of records that track data processing throughout an organisation. It is a requirement of the G.D.P.R. that the flow of personal data – whether electronic or paper records – is understood. The map and associated data produced by GDPR Mapper provides a convenient and efficient way to visualize and maintain this information.

GDPR Mapper has been designed from scratch to follow closely the guidelines and examples produced by the Isle of Man Information Commissioner but should be suitable for compliance throughout the Isle of Man, UK, EU and even worldwide.

## Before You Start

It is highly recommended that you familiarize yourself with the requirements of the G.D.P.R. before you begin to map out data. GDPR Mapper follows the “5 Ws” system, building a map based on the following five main criteria:

1. **WHY** Details about the different reason that data processing and retention may be necessary.
2. **WHO** Details about the people or entities that the data concerns.
3. **WHAT** Information about the type of data, its source and the legal basis for retention/processing.
4. **WHEN** Details about how long the data is kept, when it is processed and by whom and its disposal.
5. **WHERE** Information about the location of the data and security of access and storage

Fundamentally, GDPR Mapper provides a way of mixing and matching the 5 Ws in any combination that is required. In practice this leads to a reduction in the amount of information you need to enter, as each item in the five tables can be used for multiple purposes as necessary.

To make the best use of the system, you will need to think about all the different ways that information is stored, processed and accessed within your organisation. It's better to go into too much detail at this stage and pare down, rather than overlooking something that you may think is obvious.

## Other Programs

GDPR Mapper is part of a suite of programs to help with G.D.P.R. compliance. Programs exist to help with Management Accountability, Data Access Tracking and Policy Creation.

## The Main Program

GDPR Mapper offers a simple program interface that uses different coloured tabs for each of the required sets of information. Information can be easily entered into any of the tabs at any time. Multiple companies can be handled and the data for any company is a single data file that can be easily backed up as required.

The screenshot shows the 'G.D.P.R. Helper - David Kinrade Internet Design' application window. The title bar includes standard window controls and the version 'Version 1.00.00 Beta'. The menu bar has 'File', 'Tools', and 'Help'. Below the menu is a row of seven tabs: 'COMPANY' (black), 'WHY' (blue), 'WHO' (red), 'WHAT' (purple), 'WHEN' (green), 'WHERE' (orange), and 'REPORT' (grey). The 'COMPANY' tab is selected. The main area has a black header with the word 'COMPANY' in white. Below this is a form with the following fields:

Business Name	David Kinrade Internet Design		
Address	26 The Threshold		
Address 2			
Town	Jurby	County	Isle of Man
Postcode	IM7 3BQ		
Telephone	07624 469115		
Email	dkinrade@gmail.com		
Web Site	www.davidkinrade.com		
Report Author	David Kinrade		
Position	Proprietor		

The main screen initially looks something like the one above, with a row of colour-coded tabs across the top and information and data shown below.

### The Company Tab

Enter your company / business details here. Fill in as much or as little as you need – you can come back and make changes at any time. The company information is used to personalize the reports that you will produce using GDPR Mapper later in the process.

## The WHY Tab

This is where we enter details about the reasons WHY we process or store data. GDPR Mapper allows you to have as many different reasons as you need, but it is likely that you will only have a few different ones in a small business environment.

Item	Title	Details
1	Invoicing	
2	Site Management	Data for FTP logins, site management and maintenance.

Clicking on the NEW or EDIT buttons will open a form for you to enter the required details. You can edit or delete an entry at any time, so you don't need to complete all the information if you don't have it to hand. This allows you to use the list like a notepad, filling in details as you have them.

To make data entry easier, you can double-click on any entry in the list to edit it.

The data required for the WHY section is very simple. All you really need is to give each entry a title. GDPR Mapper provides space to enter some details that you can use to expand on the title or simply to keep notes about your reasons for creating this entry.

## The WHO Tab

Use the WHO tab to enter details about the people, businesses or entities whose data is being stored or processed.

Enter any and all categories of persons WHOSE data is processed here.  
 You should use a different category for each one and separate out current, potential and former groups of persons.  
 The same WHO entry may be associated with different WHY, WHAT, WHEN and WHERE entries to build the complete map.

**WHO**

New Edit Delete

Item	Group Name	Details
1	Customers	Primary customers we deal with on an ongoing basis. Non Contracted.

Typically, a business will have customers or clients, creditors and suppliers and possibly external sources of data or data processors. Normally each of these will have a single entry in this table that may be referred to in multiple final reported listings.

Entering and editing data is the same as for the other main tabs, click on the buttons or double-click on an entry to edit it.

GDPR Mapper - WHO

Group Name: Customers

Details: Primary customers we deal with on an ongoing basis. Non Contracted

DONE

The information for the WHO tab is very simple. The only required information is the Title, but GDPR Mapper provides a details field for further information and any notes that you may wish to record.

## The WHAT Tab

Use the WHAT tab to enter information about the specific types of data being stored and processed.

Enter details about WHAT type of data is being processed and its scope.  
Identify where the data is coming from, what legal basis there is for having the data and the exact type of data being stored.  
The same data may be referenced by different WHO, WHEN, WHY and WHERE entries to help build a comprehensive map.

**WHAT**

New Edit Delete

Item	Data Title	Data Source	Legal Basis
1	Accounts Figures	Self Entered	Required For Business, Tax
2	Contact Details	Self Entered	Required for Business
3	FTP Settings	Self Entered	Required for Business

It may be surprising just how many different types of data you work with, but they should all be entered in this section to be added to the final map.

Entering and editing data is the same as for the other main tabs, click on the buttons or double-click on an entry to edit it.

GDPR Mapper - WHAT

Data Title: Contact Details

Details: Names & Addresses, Email Addresses, Telephone Numbers

Data Source: Self Entered

Legal Basis For Processing: Required for Business

DONE

Information needs to be recorded concerning the source of the data – was it created in house, by a client or a third party – and a legal basis for the processing or storage of the data.

Refer to the G.D.P.R. for suitable legal reasons for processing. Simply claiming that the data is required for the business to function may not be sufficient for personal data.

## The WHEN Tab

The WHEN tab allows you to record details about the times when data is collected, processed, stored and deleted. You also need to consider your reasons and the legal basis for the length of retention and also how the data is finally disposed of.

Item	Description	Disclosure	Retention	
1	FTP Data	David Kinrade, Customer	During Contract	
2	Invoice Processing	David Kinrade	7 Years	

Entering and editing data is the same as for the other main tabs, click on the buttons or double-click on an entry to edit it.

You will eventually need to enter the information about when the data is created/updated, who has access, why they have access, how long the data is retained for and any legal basis for the retention. Specify how the data is disposed of.

## The WHERE Tab

Use the WHERE tab to record details about the location of data. Data may be stored locally, or possibly at a third party or even in the Cloud. Give as much information as you can about the location of any data.

Enter details about WHERE processing of data occurs.  
You need to specify the location and type of record being processed.  
Use different location entries if you need to specify different details for the particular processing being conducted at that location.

**WHERE**

New Edit Delete

Item	Location	Details
1	Filing Room	The main filing room in the office building
2	Home Office	The office at home where work is done.

Entering and editing data is the same as for the other main tabs, click on the buttons or double-click on an entry to edit it.

GDPR Mapper - WHERE

Location: Filing Room

Details: The main filing room in the office building

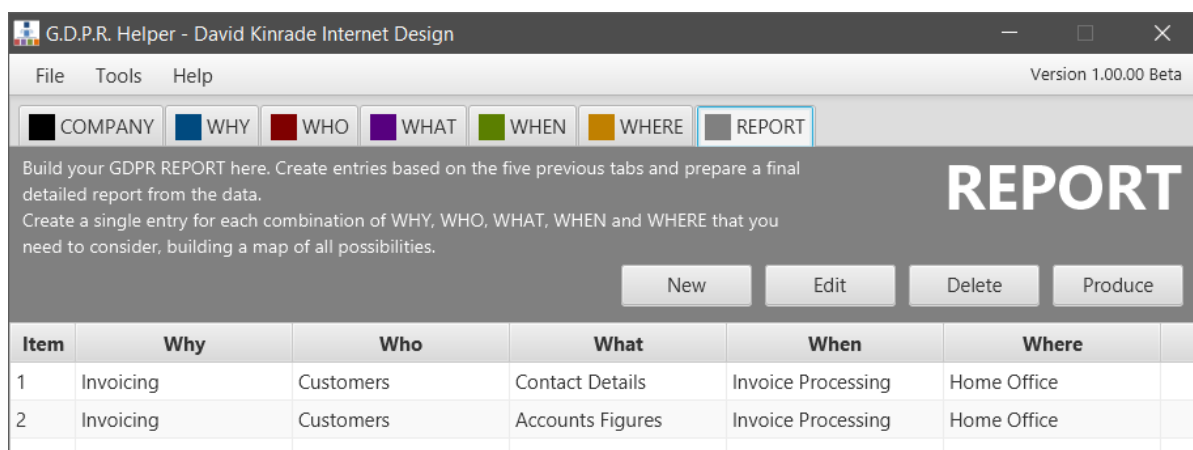
DONE

Give a title for the location and any details or notes that you would like to detail the place that information is processed or stored.



## The REPORT Tab

As you enter the data into the five main tabs – WHY, WHO, WHAT, WHEN and WHERE - you can start to create the entries that will form the basis of your report and Data Processing Map.



A REPORT entry is built by tying together each of the five Ws into a linked entry for the map. Entering and editing data is the same as for the other main tabs, click on the buttons or double-click on an entry to edit it.

**WHY** Choose a Reason WHY data is processed from your list of choices below.  
Site Management

**WHO** Select an entity WHO the above reason WHY applies to from the list of options you have entered.  
Customers

**WHAT** Pick the category you have created that describes WHAT data is being processed for the reason WHY above.  
FTP Settings

**WHEN** Pick your entered description of WHEN the data selected above is processed, stored, shared and destroyed.  
FTP Data

**WHERE** Select your previously stored entry describing WHERE the data is stored and/or processed.  
Home Office

DONE

Select the appropriate entry from each of the drop-down lists to create a new report entry. You may have several different report entries with similar information – perhaps differing only in the WHAT or WHERE sections. Don't try and amalgamate entries, make a different report entry for each of the possibilities you need to deal with.

## Producing The Report

Finally, clicking on the PRODUCE button will build and display a PDF file that you can save or print as required. Data can be stored and modified indefinitely, helping you to maintain an always up-to-date copy of your Data Processing Map.