



6.1 Process Overview

Process	Owner
Documented process and procedure for Freedom and rights of a Data Subject in compliance with the New GDPR Legislation	Sirona Medical Insourcing : Mark (MD)

Scope Statement

Gathering and documenting of personal and sensitive data flow process and procedures including assets used to process such information in line with GDPR regulations

Purpose of Process

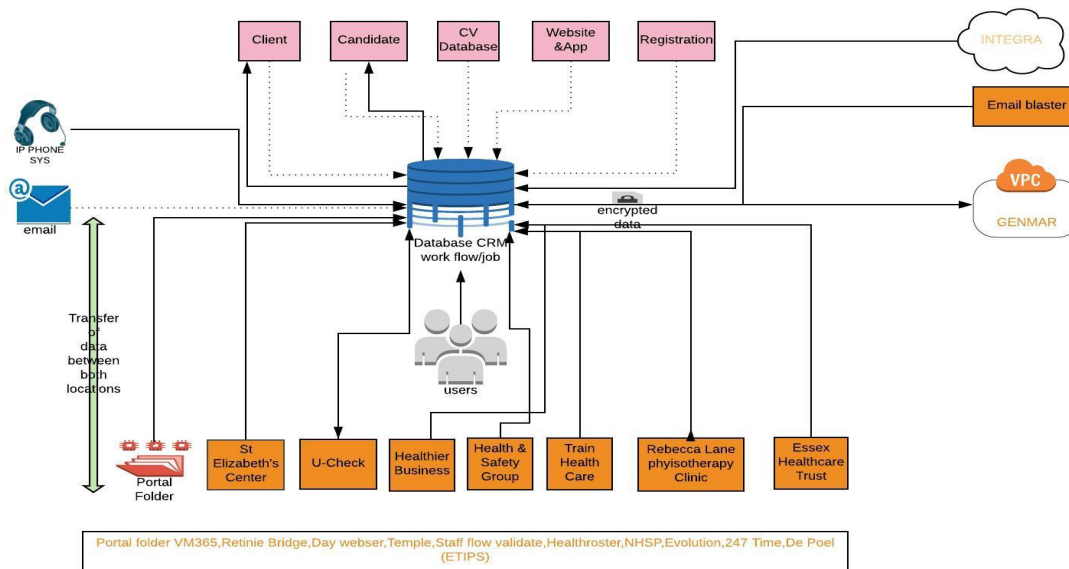
Gain an insight into how data is obtained, transferred, stored and processed in Line with the New GDPR regulation

Summary

According to the process map and details of its components in this process

1. The lawful basis for processing data includes legal obligation, employment law, consent and legitimate business interest
2. Does not include cross border transfer
3. Includes transfer of data outside the EEA.
4. It Includes both personal and sensitive data

6.2 Data Map



6.3 Personal data Inventory

Personal data relates to any information relating to the identified or identifiable natural person (Data Subject).



Summary

1. Include some special category data.
2. The lawful basis for processing 5 data items is Employment law
3. The lawful basis for processing 3 data items is Contractual obligation
4. The lawful basis for processing 4 data items is legitimate business Interest
5. The lawful basis for processing 3 data items is Consent

Data Item	Data subject	Lawful basis
Registration data/CV	Candidate	Legitimate business Interest
Age	Candidate	Employment Law
Name	Candidate	Legitimate business Interest
Gender	Candidate	Contractual Obligation
DBS Number	Candidate	Employment Law
Passport number	Candidate/Employee	Employment law
N.I Number	Candidate/Employee	Employment Law
Phone number	Candidate/Client/ Contractor	Legitimate business Interest
Email address	Candidate/Client/ Contractor	Legitimate business interest
Bank details	Employee/contractors	Contractual Obligation
Nurse Registration Number	Candidate	Employment law
Blood type Data	Candidate	Legal Obligation
Login/User details	Candidate/Employees	Contractual Obligation
Cookies	Candidate	Consent
IP address	Candidate	Consent
Photograph	Candidate	Consent

Job Title	Candidate	Legitimate business Interest
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6.4 Asset Register

Name/Asset	Location	Operator	Records	Comments
INFLUENCE	UK	Controller	All Data records	Internal CRM
GEMMAR	UK/Outside EEA	Joint 	All Data Record	Third party agreement review
INTEGRA	UK	Joint 	HR Records	Third party agreement review
WEBSITE AND MOBILE APP	UK	Controller	Registration data/ cookies/IP	Data and Acceptance User Policy
EMAIL SERVER	UK	Controller	All Data Records	SSL, Encryption by default
IP PHONE SYSTEM	UK	Controller	Registration data	Grand stream connected to CRM