

A2. What is your self-assessment of your legal knowledge on GDPR?

1 is the lowest value (minimum knowledge) and 5 the highest value.

- 1 ☐
- 2 ☐
- 3 ☐
- 4 ☐
- 5 ☒

A3. What is your self-assessment of your technical / IT knowledge on the GDPR implementation ?

1 is the lowest value (minimum knowledge) and 5 the highest value.

- 1 ☐
- 2 ☐
- 3 ☐
- 4 ☒
- 5 ☐

A4. How many years of experience do you have on privacy issues ?

5	.	0	0	0	0	0	0	0	0
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Section B: Question 1

Have you reviewed your organisation's mechanisms for collecting consent to ensure that it is freely given, specific, informed and that it is a clear indication that an individual has chosen to agree to the processing of their data by way of statement or a clear affirmative action?

B1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

B2. Justify

specific -> modeled
informed -> can be
-> freely : complicated to be

B3. This question has been dealt with in the part:

1-Actors ☐

2-Data ☐

3-Processings ☐

4-Consent ☒

5-Rights ☐

6-Breaches ☐

B4. This question is relevant

Yes ☒

No ☐

Section C: Question 2

If personal data that you currently hold on the basis of consent does not meet the required standard under the GDPR, have you re-sought the individual's consent to ensure compliance with the GDPR ?

C1. This question is:

fully modeled ☒

partially modeled ☐

not modeled ☐

should not be modeled ☐

C2. Justify

C3. This question has been dealt with in the part:

1-Actors ☐

2-Data ☐

3-Processings ☐

4-Consent ☒

5-Rights ☐

6-Breaches ☐

C4. This question is relevant

Yes ☒

No ☐

Section D: Question 3

Are procedures in place to demonstrate that an individual has consented to their data being processed ?

D1. This question is:

fully modeled ☒

partially modeled ☐

not modeled ☐

should not be modeled ☐

D2. Justify

D3. This question has been dealt with in the part:

1-Actors ☐

2-Data ☐

3-Processings ☐

4-Consent ☒

5-Rights ☐

6-Breaches ☐

D4. This question is relevant

Yes ☒

No ☐

Section E: Question 4

Are procedures in place to allow an individual to withdraw their consent to the processing of their personal data?

E1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

E2. Justify

E3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☒
- 5-Rights ☐
- 6-Breaches ☐

E4. This question is relevant

- Yes ☒
- No ☐

Section F: Question 5

Where online services are provided to a child, are procedures in place to verify age and get consent of a parent/ legal guardian, where required?

F1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

F2. Justify

how to check the real age ?

F3. This question has been dealt with in the part:

- 1-Actors ☒
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

F4. This question is relevant

- Yes ☒
- No ☐

Section G: Question 6

If legitimate interest is a legal basis on which personal data is processed, has an appropriate analysis been carried out to ensure that the use of this legal basis is appropriate? That analysis must demonstrate that 1) there is a valid legitimate interest, 2) the data processing is strictly necessary in pursuit of the legitimate interest, and 3) the processing is not prejudicial to or overridden by the rights of the individual.

G1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

G2. Justify

subjective appreciation of it, must insist more on the 3 steps (valid, necessary, prejudicial)

G3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

G4. This question is relevant

- Yes ☒
- No ☐

Section H: Question 7

Is there a documented policy/procedure for handling Subject Access Requests (SARs) ?

H1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

H2. Justify

processing request : who, when, how ?

H3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

H4. This question is relevant

- Yes ☒
- No ☐

Section I: Question 8

Is your organisation able to respond to SARs within one month ?

I1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

I2. Justify

I3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

I4. This question is relevant

- Yes ☒
- No ☐

Section J: Question 9

Are procedures in place to provide individuals with their personal data in a structured, commonly used and machine readable format ?

J1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

J2. Justify

how does the files are transfered and given ? can't see it in the scheme

J3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

J4. This question is relevant

- Yes ☒
- No ☐

Section K: Question 10

Are there controls and procedures in place to allow personal data to be deleted or rectified (where applicable) ?

K1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

K2. Justify

K3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

K4. This question is relevant

- Yes ☒
- No ☐

Section L: Question 11

Are there controls and procedures in place to halt the processing of personal data where an individual has on valid grounds sought the restriction of processing ?

L1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

L2. Justify

L3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

L4. This question is relevant

- Yes ☒
- No ☐

Section M: Question 12

Are individuals told about their right to object to certain types of processing such as direct marketing or where the legal basis of the processing is legitimate interests or necessary for a task carried out in the public interest ?

M1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

M2. Justify

M3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

M4. This question is relevant

- Yes ☒
- No ☐

Section N: Question 13

Are there controls and procedures in place to halt the processing of personal data where an individual has objected to the processing?

N1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

N2. Justify

for some processings yes, not all of them

N3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

N4. This question is relevant

- Yes ☒
- No ☐

Section O: Question 14

If automated decision making, which has a legal or significant similar affect for an individual, is based on consent, has explicit consent been collected?

O1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

O2. Justify

not concerned

O3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

O4. This question is relevant

- Yes ☒
- No ☐

Section P: Question 15

Where an automated decision is made which is necessary for entering into, or performance of, a contract, or based on the explicit consent of an individual, are procedures in place to facilitate an individual's right to obtain human intervention and to contest the decision ?

P1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

P2. Justify

not concerned, but something must be implemented to obtain, to notify a human intervention, and actions must be logged

P3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

P4. This question is relevant

- Yes ☒
- No ☐

Section Q: Question 16

Have the circumstances been documented in which an individual's data protection rights may be lawfully restricted ?

Q1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

Q2. Justify

Q3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

Q4. This question is relevant

- Yes ☒
- No ☐

Section R: Question 17

Is personal data only used for the purposes for which it was originally collected ?

R1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

R2. Justify

checking it once a month with the register checking and data collection/use

R3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

R4. This question is relevant

- Yes ☒
- No ☐

Section S: Question 18

Is the personal data collected limited to what is necessary for the purposes for which it is processed ?

S1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

S2. Justify

S3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

S4. This question is relevant

- Yes ☒
- No ☐

Section T: Question 19

Are procedures in place to ensure personal data is kept up to date and accurate and where a correction is required, the necessary changes are made without delay ?

T1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

T2. Justify

for some processings, it is, for many others, it is not, for example about papers processings

T3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

T4. This question is relevant

- Yes ☒
- No ☐

Section U: Question 20

Are retention policies and procedures in place to ensure data is held for no longer than is necessary for the purposes for which it was collected ?

U1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

U2. Justify

U3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

U4. This question is relevant

- Yes ☒
- No ☐

Section V: Question 21

Is your business subject to other rules that require a minimum retention period (e.g. medical records/tax records) ?

V1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

V2. Justify

not concerned now, but before it was, and it was modeled, retention period were modified with every new event in the record

V3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

V4. This question is relevant

- Yes ☒
- No ☐

Section W: Question 22

Do you have procedures in place to ensure data is destroyed securely, in accordance with your retention policies ?

W1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

W2. Justify

W3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☒
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

W4. This question is relevant

- Yes ☒
- No ☐

Section X: Question 23

Are procedures in place to ensure that there is no unnecessary or unregulated duplication of records ?

X1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

X2. Justify

must be, did a "cleaning day" once a year, and integrate no-duplication principle in the policies

X3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

X4. This question is relevant

- Yes ☒
- No ☐

Section Y: Question 24

Are service users/employees fully informed of how you use their data in a concise, transparent, intelligible and easily accessible form using clear and plain language ?

Y1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

Y2. Justify

Y3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

Y4. This question is relevant

- Yes ☒
- No ☐

Section Z: Question 25

Where personal data is collected directly from the individuals, are procedures in place to provide the information listed at Article 13 of the GDPR ?

Z1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

Z2. Justify

Z3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

Z4. This question is relevant

- Yes ☒
- No ☐

Section AA: Question 26

If personal data is not collected from the subject but from a third party (e.g. acquired as part of a merger) are procedures in place to provide the information listed at Article 14 of the GDPR?

AA1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AA2. Justify

imposed in the contract with processors

AA3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AA4. This question is relevant

- Yes ☒
- No ☐

Section AB: Question 27

When engaging with individuals, such as when providing a service, sale of a good or CCTV monitoring, are procedures in place to proactively inform individuals of their GDPR rights ?

AB1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AB2. Justify

AB3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

AB4. This question is relevant

- Yes ☒
- No ☐

Section AC: Question 28

Is information on how the organisation facilitates individuals exercising their GDPR rights published in an easily accessible and readable format ?

AC1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AC2. Justify

AC3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

AC4. This question is relevant

- Yes ☒
- No ☐

Section AD: Question 29

Have agreements with suppliers and other third parties processing personal data on your behalf been reviewed to ensure all appropriate data protection requirements are included ?

AD1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AD2. Justify

AD3. This question has been dealt with in the part:

- 1-Actors ☒
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AD4. This question is relevant

- Yes ☒
- No ☐

Section AE: Question 30

Do you need to appoint a DPO as per Article 37 of the GDPR ?

AE1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AE2. Justify

AE3. This question has been dealt with in the part:

- 1-Actors ☒
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AE4. This question is relevant

- Yes ☒
- No ☐

Section AF: Question 31

If it is decided that a DPO is not required, have you documented the reasons why ?

AF1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

AF2. Justify

not concerned.

Just a little thing for the next question : some questions are about both topics at the same time : data & processing, or actors & processings, we should have had the possibility to thick 2 bullet points

AF3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AF4. This question is relevant

- Yes ☒
- No ☐

Section AG: Question 32

Where a DPO is appointed, are escalation and reporting lines in place? Are these procedures documented ?

AG1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AG2. Justify

AG3. This question has been dealt with in the part:

- 1-Actors ☒
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AG4. This question is relevant

- Yes ☒
- No ☐

Section AH: Question 33

Have you published the contact details of your DPO to facilitate your customers/ employees in making contact with them?
(Note: post 25 May 2018 you will also be required to notify your data protection authority of your DPO's contact details)

AH1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AH2. Justify

AH3. This question has been dealt with in the part:

- 1-Actors ☒
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AH4. This question is relevant

- Yes ☒
- No ☐

Section AI: Question 34

If your data processing is considered high risk, do you have a process for identifying the need for, and conducting of, DPIAs?
Are these procedures documented ?

AI1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AI2. Justify

AI3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AI4. This question is relevant

- Yes ☒
- No ☐

Section AJ: Question 35

Have you assessed the risks involved in processing personal data and put measures in place to mitigate against them ?

AJ1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AJ2. Justify

create a kind of "list" with measures, and create a checklist to monthly verify the measures REALLY put and their evolution (and the risk evolution at the same time)

AJ3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AJ4. This question is relevant

- Yes ☒
- No ☐

Section AK: Question 36

Is there a documented security programme that specifies the technical, administrative and physical safeguards for personal data ?

AK1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AK2. Justify

AK3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AK4. This question is relevant

- Yes ☒
- No ☐

Section AL: Question 37

Is there a documented process for resolving security related complaints and issues ?

AL1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AL2. Justify

AL3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AL4. This question is relevant

- Yes ☒
- No ☐

Section AM: Question 38

Is there a designated individual who is responsible for preventing and investigating security breaches ?

AM1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AM2. Justify

AM3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AM4. This question is relevant

- Yes ☒
- No ☐

Section AN: Question 39

Are industry standard encryption technologies employed for transferring, storing, and receiving individuals' sensitive personal information ?

AN1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AN2. Justify

me be actualized and imposed for more processings

AN3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☒
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AN4. This question is relevant

- Yes ☒
- No ☐

Section AO: Question 40

Is personal information systematically destroyed, erased, or anonymised when it is no longer legally required to be retained.

AO1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AO2. Justify

not automated enough

AO3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☒
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AO4. This question is relevant

- Yes ☒
- No ☐

Section AP: Question 41

Can access to personal data be restored in a timely manner in the event of a physical or technical incident ?

AP1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AP2. Justify

manual intervention, designated people, but never happened

AP3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AP4. This question is relevant

- Yes ☒
- No ☐

Section AQ: Question 42

Does the organisation have a documented privacy and security incident response plan ?

AQ1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AQ2. Justify

AQ3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AQ4. This question is relevant

- Yes ☒
- No ☐

Section AR: Question 43

Are plans and procedures regularly reviewed ?

AR1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AR2. Justify

AR3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

AR4. This question is relevant

- Yes ☒
- No ☐

Section AS: Question 44

Are there procedures in place to notify the office of the Data Protection Commissioner of a data breach ?

AS1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AS2. Justify

AS3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AS4. This question is relevant

- Yes ☒
- No ☐

Section AT: Question 45

Are there procedures in place to notify data subjects of a data breach (where applicable) ?

AT1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AT2. Justify

AT3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AT4. This question is relevant

- Yes ☒
- No ☐

Section AU: Question 46

Are all data breaches fully documented ?

AU1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AU2. Justify

10 scenarios chosen

AU3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AU4. This question is relevant

- Yes ☒
- No ☐

Section AV: Question 47

Are there cooperation procedures in place between data controllers, suppliers and other partners to deal with data breaches ?

AV1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AV2. Justify

AV3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☒

AV4. This question is relevant

- Yes ☒
- No ☐

Section AW: Question 48

Is personal data transferred outside the EEA, e.g. to the US or other countries ?

AW1. This question is:

- fully modeled ☒
- partially modeled ☐
- not modeled ☐
- should not be modeled ☐

AW2. Justify

AW3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AW4. This question is relevant

- Yes ☒
- No ☐

Section AX: Question 49

Does this include any special categories of personal data ?

AX1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AX2. Justify

can be very different from a processing to another, but yes, sensitive (health) data involved sometimes

AX3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AX4. This question is relevant

- Yes ☒
- No ☐

Section AY: Question 50

What is the purpose(s) of the transfer ?

AY1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

AY2. Justify

health bills payment

AY3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AY4. This question is relevant

- Yes ☒
- No ☐

Section AZ: Question 51

Who is the transfer to ?

AZ1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

AZ2. Justify

Tunisia, Madagascar

AZ3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

AZ4. This question is relevant

- Yes ☒
- No ☐

Section BA: Question 52

Are all transfers listed - including answers to the previous questions (e.g. the nature of the data, the purpose of the processing, from which country the data is exported and which country receives the data and who the recipient of the transfer is ?)

BA1. This question is:

- fully modeled ☐
- partially modeled ☐
- not modeled ☒
- should not be modeled ☐

BA2. Justify

not a "transfers list" but every transfer is mentioned in the register

BA3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

BA4. This question is relevant

- Yes ☒
- No ☐

Section BB: Question 53

Is there a legal basis for the transfer, e.g. EU Commission adequacy decision; standard contractual clauses. Are these bases documented ?

BB1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

BB2. Justify

SCT (no adequacy)

BB3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☒
- 4-Consent ☐
- 5-Rights ☐
- 6-Breaches ☐

BB4. This question is relevant

- Yes ☒
- No ☐

Section BC: Question 54

Are data subjects fully informed about any intended international transfers of their personal data ?

BC1. This question is:

- fully modeled ☐
- partially modeled ☒
- not modeled ☐
- should not be modeled ☐

BC2. Justify

currently checked when I left the company

BC3. This question has been dealt with in the part:

- 1-Actors ☐
- 2-Data ☐
- 3-Processings ☐
- 4-Consent ☐
- 5-Rights ☒
- 6-Breaches ☐

BC4. This question is relevant

- Yes ☒
- No ☐

Section BD: Final Questions

BD1. Is there anything else you would like to add?

sorry I put it in the middle of the survey, we should be able to chose 2-3 parts (data, actors, consent, etc)
because some questions are related to more than 1

BD2. What do you think of this questionnaire?

don't really understand the last last question 'relevant' or not. Of course it is, well done !