# Data Protection (GDPR) Guidance Note

# OneTrust Data Mapping User Guidance

OneTrust Data Mapping is software that enables the University to identify and document its various data processing activities (the reasons why personal information is collected) and any associated assets (the locations or systems used to store information). This is a requirement of the new Data Protection legislation.

Users who are involved in OneTrust Data Mapping will receive questionnaires from the software which will prompt them to provide additional information on a processing activity or an asset.

## Getting Started

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| 1. | You will receive an email from OneTrust with a link to click on (Launch Assessment) | OneTrust makes it easy for you to collaborate with your company's privacy office on assessments, initiatives, and business processes.<br><br>Your team has appointed you as the assessment respondent to answer questions about "Lung function software for health surveillance".<br><br>Please use the link below to access the assessment.<br><br>**Launch Assessment** |
| 2. | The link will take you to your assessments page which will list all of the assessments you will need to complete.<br>To begin an assessment click on the name of the processing activity/asset (the blue text)<br>If you do not see any assessments here please contact djj11@le.ac.uk who will investigate this. | Assessments (table with columns: ID, Name, Template, Stage, Result, Risk Level..., Organizat..., Responde..., Approver, Deadli — rows: 51 A Feb Test 4a, Processing Ac..., Completed, Approved, ----, University of ..., David Jenkins, David Jenkins, No Dea; 50 A Feb Test 4, Processing Ac..., In Progress, ----, ----, University of ..., David Jenkins, David Jenkins, No Dea) |
| 3. | You will then be presented with a welcome screen, this gives an explanation as to why you have received the email. Once you have read the text please click 'Get Started'. | |
| 4. | If, at any time, you feel that someone else should complete the assessment rather than you please email djj11@le.ac.uk who will progress this. | |

## Data Processing Activities Questionnaires

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| The majority of questionnaires you receive will relate to data processing activities (the reasons why information is collected). You will be able to identify these questionnaires because there will be eight sections visible when you launch an assessment. You can also confirm this by referring back to your list of Assessments (a list of all the questionnaires you need to complete) which will distinguish 'data processing activities' from 'assets' in the 'Type' column. | |
| 1. | The first section concerns the business process purpose around what you are doing with data.<br>• You will initially need to provide some more information describing your data processing activity which will typically involve explaining what you are doing with the data. This is a mandatory field and must be completed (throughout the questionnaire mandatory fields can be identified by a red * at the end of a question). |

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| | • You will then need to categories the business purpose(s) of your processing activity. You can select multiple options here and if your purpose is not included you may select 'other' and then type in the name of the business purpose and then click on the green tick. This is a mandatory field as must be completed. |
| | • You will then need to describe the country in which this data is used in from the drop down list. You may also type in the name of the county and it should then appear in the list. You may select multiple countries. |
| | • You will then need to describe your lawful basis for processing the information. You may select more than one lawful basis if appropriate. When completing this section please note that 'legitimate interests' will not be applicable in most cases for the University. If you are dealing with any 'special category' data you will also need to confirm the 'additional condition' for processing that data (if you are not processing this type of data please select 'not applicable'). More information on lawful basis can be found here. This is a mandatory field as must be completed. |
| | • You will then need to answer a question around the organisational security measures associated with your processing. |
| | • To navigate to the next section either click on the 'next section' button. |
| 2. | The next section will ask you about the individuals whose data you are collecting and using.<br>• Firstly you will need to confirm whether any of the data associated with the processing activity is special category data.<br>• You will then need to select the categories of individual that the processing activity relates to. You may select multiple categories of individuals. Select 'add data subject' and then select a data subject group from the drop down options at the top of the window and work your way through the applicable data elements, if none apply then simple leave them unselected. Once you have selected all appropriate data elements please click 'update'. If you have more than one group of data subjects simply complete this step again by clicking 'add data subject'<br>• Depending on what sort of individuals you have selected different follow-up questions will be generated. With any follow up questions if the information is not applicable (i.e. you are not collecting biometric data) then please do not select any options.<br>• You will need to identify the location in the world where the individuals related to this processing activity resides. For this question if the answer is somewhere in the EEA then you should select 'Europe (EEA)' rather than an individual EEA country.<br>• You will then need to give an estimate of how many individuals are involved in this processing activity.<br>• The last question in this section will ask you to give the retention period for this data. Please complete this by describing the retention period and any issues around the retention of data. |
| 3. | The next section will covers information on where the data for this processing activity comes from.<br>• You will initially need to specify whether the data comes directly from the individual, or whether you obtain the information from a different system or location (referred to as an asset)<br>• If you specify that the data comes directly from the individual then you can move on to the next question.<br>• If you specify that your data comes from an 'asset' then you will then see a follow-up question asking you to select which asset the information comes from. If the asset has already been input into OneTrust you should be able to select this from the drop down list by typing in the name of the asset. If the asset has not been created you can begin typing in the name of that asset and then click 'add'. You will then be prompted to add some extra information around that asset, if you are unsure you can leave the information un-selected. |

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| 4. | The next section will cover the storage of information related to your processing activity. Typically this will involve describing what systems or location the information is stored in.<br>• You will initially need to select that 'asset' that stores the information. If the asset has already been input into OneTrust you should be able to select this from the drop down list by typing in the name of the asset. If the asset has not been created you can begin typing in the name of that asset and then click 'add'. You will then be prompted to add some extra information around that asset, if you are unsure you can leave the information un-selected.<br>• You will then need to describe how the data is collected from its source and then stored in this asset. Examples of this might include an integration with a 'golden source' data source such as SAP or SITS or might involve transfer of files. A full list of the options in this section and their descriptions can be found in the glossary. You may select multiple transfer mechanisms. |
| 5. | The next section will cover any transfer of information from its storage location to other individuals or assets. If there is no further movement of the data you can select 'not applicable'<br>• If you specify that your data comes from an 'asset' then you will then see a follow-up question asking you to select which asset the information comes from. If the asset has already been input into OneTrust you should be able to select this from the drop down list by typing in the name of the asset. If the asset has not been created you can begin typing in the name of that asset and then click 'add'. You will then be prompted to add some extra information around that asset, if you are unsure you can leave the information un-selected. Once this is complete the system will then generate a follow up question.<br>• If you select 'directly to individuals' it will then generate a follow up question.<br>• You will then need to describe how the data is collected from its source and then stored in this asset. Examples of this might include an integration with a 'golden source' data source such as SAP or SITS or might involve transfer of files. A full list of the options in this section and their descriptions can be found in the glossary. You may select multiple transfer mechanisms. |
| 6. | The next section concerns how the information is accessed and used by other parties. This type of use might involve internal or external use.<br>• You will initially be asked to select from a drop down list which parties have access to this information. You may select multiple parties. If this is not applicable please select 'Not Applicable' from the list.<br>• If you have selected a party you will then need to outline where these parties are located. Please select which county is applicable from the list. To avoid navigating to the county you can begin typing the name and the county should appear (i.e. typing 'United' will include all counties beginning with United in the name) |
| 7. | The final section will document the role the University of Leicester adopts in the management of data, either as a data controller, joint data controller, or processor.<br>• You will initially need to describe whether you a data controller, joint data controller, or processor.<br>• A series of follow up questions will ask you to provide information on the contact details of the data controllers or processors<br>• If the UoL is the processor please insert 'Parmjit Gill' as the Data Controller.<br>• Once you have completed this section (if all mandatory fields have been completed) you will be able to submit the assignment by clicking on the 'submit button'. |

# Data Protection (GDPR) Guidance Note

## Assets Questionnaires

A smaller proportion of questionnaires that you receive will be around the 'asset' used to store the information you have referred to in the 'processing activity' questionnaires. You will be able to identify these questionnaires because there will be five sections visible when you launch an assessment. You can also confirm this by referring back to your list of Assessments (a list of all the questionnaires you need to complete) which will distinguish 'data processing activities' from 'assets' in the 'Type' column.

The questions in this questionnaire will relate to the technical aspects of the systems/locations storing the information. If you are unsure about some of the technical aspects of your assets then please email djj11@le.ac.uk who will provide further information or suggest re-assigning the questionnaire to an appropriate ITS member of staff.

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| 1. | The first section is around the asset information.<br><br>• You will initially need to provide some more information describing your asset. This is a mandatory field as must be completed.<br>• You will then need to outline who is the 'owner' of this asset<br>• You will then need to describe what type of asset or vendor this is. For definitions of the various options please see our glossary. If you are unsure do not select any of the options.<br>• You will then need to describe whether the asset is hosted/located on premise (i.e. UoL's campus or servers) or externally on the Cloud. Depending on your response various follow on questions will be generated.<br>    o If you selected on premise then you will be asked whether this is an internal asset or one from a 3rd party. If you do not know the answer please select 'Not sure'.<br>    o If you selected Cloud you will then need to describe who the company is that provides the storage. If you do not know the answer please select 'Not sure'.<br>• You will then be asked to identify the county where this asset is located. In many cases (as part of the import process into OneTrust) this will have been set to 'unknown' – if this is the case please delete the 'unknown' text and then select the relevant county<br>• You will then need to estimate how many individuals have personal data stored in this asset by selecting the relevant range.<br>• You will then need to describe what is the format of the asset it. For definitions of the various options please see our glossary. You may select multiple options. If you do not know the answer please select 'Not sure'.<br>• You have now completed this first section. |
| 2. | The next section will focus on the security measures associated with the asset.<br><br>• The first question covers the technical security measures associated with the asset. These are the IT safeguards that make the asset secure. You may select multiple options.<br>• You will then need to describe what organisational security measures are in place. These are the practical safeguards (not necessarily IT in nature) that protect the information in the asset such as awareness and training.<br>• You will then have the option of describing any additional security measures or access controls. If you do not have any you can either leave this blank or type 'Not Applicable' |
| 3. | The next section focused on the disposal of the information stored within this asset. Please note that disposal can either mean transfer to long term retention in a physical or electronic archive or deletion/destruction. |

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| | • The first question asked you to describe the how data is either deleted or archived.<br>• You will then be asked to describe the retention period for the information. In this section you should outline how long the data is generally retained for any how that disposal happens (i.e. a function in the system allows for destruction) |
| 4. | The Final section will ask to you to identify what 'data protecting activity' (the thing you are doing with an individual's data) that this asset relates to.<br><br>• You will need to search for the data processing activity form pre-existing activities that have been input into OneTrust (this will need to have been captured in the data mapping process prior to import into OneTrust).<br>• If you start typing a name it should appear in the results if it has been created already. Once you have selected this asset you may submit the assignment.<br>• If the activity does not appear in the results you can type in the name of the activity and select 'add'. You will then need to select the person who knows most about this newly created activity. Start typing the name of the individual you want and their name should appear. If there name does not appear this indicates that they have not been created as a user in OneTrust – in these cases please email djj11@le.ac.uk who will progress this. If you are not sure of the answer please select 'not sure'<br>• If you have completed all sections successfully you will then be able to submit the questionnaire by clicking on the 'submit' button. |

## Glossary

### The Source of the Data

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| API's | A method of communication between various software components. It avoids the need for human interaction. |
| Application Integration | The process of bringing resources from one application to another often using 'middleware' to achieve this. |
| Electronic Copy | Copying data from an original data source and loading it into a new asset. |
| Email | Data received via an email. |
| File Transfer | Moving information from a computer/network to another. File Transfer Protocol (FTP) is a common protocol used on computer networks and online. |
| Paper Format | Physical paper files |
| Web Form | An online page that allows for user input. It often mimics a paper document or form where one fills out particular fields. |

### The Type of Asset or Vendor

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| Application | A computer programme that performs a particular function directly for a user |
| Database | A collection of information that is organised to enable easy access and management. Data is organised into rows, columns, and tables and indexed. |
| Physical Storage | A physical location to store information such as a filing cabinet, storage room, or building. |
| Vendor | A third party provider |

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| Website | Information available via a web interface over the internet. |
| **Storage Format of the Asset** | |
| Backup Tapes | A traditional back up procedure using a tape cartridge as a storage device. |
| Cloud Storage | Storing data on remote servers accessed from the internet (or the cloud") |
| Data Store | An electronic location used for archiving data by a computer or device |
| File Cabinet | Physical storage for paper files |
| File Warehouse | Physical store building for paper files |
| FTP Server | A computer using a file transfer protocol address which receives a FTP connection |
| Portable Media | Storage media that can be moved to different locations and connected to devices such as USB memory sticks or CDs. |
| Shared Drive | A network drive on the UoL IT system available to a number of different people. |
| Web Server | A system that delivers content or services to users over the internet (can also be known as an internet server). |