

Data Protection Checklist for Companies Preparing to Sell

ITEM#	ITEM	YES	WORKING ON IT	NOT STARTED	N/A
1	Do you have a current list of jurisdictions that apply to your data protection obligations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Do you have a complete and current data inventory of personal information you collect and process in your company?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Have you categorized your data into a classification schema, e.g. Highly Confidential, Confidential, Internal Use, Public?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Have you determined which data processing role, i.e., data controller, data processor or joint controller, you serve by system and data processed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Do you a complete and current Records of Processing Activities (ROPA) which specifies the legal basis of each type of personal information you process? This include employees, customers and any other persons who could be identified via the data or combination of data you hold?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Do you have a Privacy Policy that covers data processing you do for prospective and current customers and employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	Do you have an accurate current public-facing Privacy Notice?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	If you transfer data internationally, do you have executed Data Processing Agreements in place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Do you have a Vendor Risk Management program in place and do you perform privacy impact assessments as part of your program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	Do you perform vendor security assessments or audits prior to purchase and regularly to ensure compliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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11	Do you have a data retention policy and associated procedures and do you follow your policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12	Do you have a data destruction policy and associated procedures and do you follow your policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13	Do you have a information security standard in place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14	Do you apply appropriate technical safeguards to protect personal information? Could your practices and controls pass an audit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15	Do you have an incident management plan and process?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16	Do you have a data breach notification process and have you tested it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17	Do you have a working data subject access request process?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18	Do you conduct regular IT security and privacy training and do you track completion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	Do you have a risk management program and do you maintain a current risk register?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20	Do you have an Governance, Risk and Compliance committee which oversees your data management, privacy and security?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Your Answers from each column:		Total YES	Total In Process	Total Not Started	Total N/A
Your data privacy practices are likely in good shape if you answered YES to at least 15 out of 20 . Make sure you can substantiate your answers.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Your company **may be at risk** if you have items that are **in process** or most likely at risk for those areas you marked not started.

Would you like to learn how to reduce your data protection risk and add more value to your business so that you are better prepared for the buyer?

Book a complimentary 50 minute Data Protection Strategy Session

Call Nalini Kaplan at 720.500.6674 or email at nalini@ReThinkPrivacy.com to schedule your session