APPENDIX 4 of GDPR GUIDANCE
GDPR PENSION SCHEME SAMPLE CHECKLIST

	Role/Relationship/ Incident	Required Action/Document	Guidance Section	✓ / ✗
1.	Controller & Processor relationship	Data Processing Agreement	Sections 1, 2 and 5	
2.	Joint Controllers	Controller to Controller Agreement	Sections 1.4 and 5.3	
3.	(Other) Controllers	Agreement (as above) stating basis on which data will be transferred	Section 1	
4.	Processor to Processor	Sub-processing agreement	Sections 1 and 5	
5.	Controller & data subject relationship	Identify data and basis for processing it	Section 3 Apdx 1 & 2	
6.	Acting as a Controller	(1) Data Privacy/Transparency Notice	Sections 1, 2	
		(2) Data Protection Policy	Section 4	
		(3) Data Subject Rights Policy	Section 4.2 and Apdx 3	
		(4) Data Subject Request Register	Section 8	
		(5) Data Breach Policy	Section 6	
		(6) Data Security Policy	Section 7	
		(7) Data Retention Policy	Section 4	
7.	Occurrence of "high risk" processing	Data Protection Impact Assessment (DPIA)	Part A, 3.1(g)	
8.	Data Breach likely to result in a risk (e.g. physical, material or non-material damage for individuals) to the rights and freedoms of natural persons	Controller to communicate breach to Commissioner within 72 hours of becoming aware and implement breach procedure	Section 6	
9.	Any data breach	Processor to notify Controller without undue delay and implement breach procedure	Section 6	