

# Example of a Record of Data Processing

Using the information from its audit, our high street law firm created a record of data processing as required by the GDPR.

## Record of Data Processing of High Street Law

Contact details of Controller: 1 High Street, Edinburgh EH1 1LP; Tel: 0131 222 2222; E: info@highstreet.co.uk

Data Set	Purpose of Processing (Identify legal basis)	Categories of Data Subjects	Categories of Personal Data	Categories of recipients of Personal Data	Time limits for erasure	How do we ensure information is updated	Description of technical and organisational measures to secure
Identification documentation for clients	To ensure compliance with AML obligations under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017	Individual clients and beneficial owners of corporate clients	Copy of passport or driver's licence, proof of address, copy of bank statements, other information from third parties to confirm identity	<ul style="list-style-type: none"> <li>Third party service provider who carries out identity checks</li> </ul>	Five years after the transaction is complete	Our AML policy indicates how often we require to update the AML checks	Held in a secure area of our practice/document management system to which access is restricted to staff involved in AML checks. Paper copies are destroyed securely
Contact details provided by family law client	To contact the client about their case	Individual clients and employees of corporate clients	Name, home or work address, email address and phone number	<ul style="list-style-type: none"> <li>Cloud based server hosted by third party</li> <li>Documented on paper files</li> <li>Solicitor's mobile phone</li> </ul>	Five years after the matter is complete if no further instructions	Client is asked in terms and conditions to inform us of changes. We will confirm contacts details on receiving new instruction. We will update on database and paper file	<p>Held in our client management system which is hosted on a cloud server (third party)</p> <p>All laptops and other end user devices which can access the information in the cloud server are encrypted and can only be accessed using multi factor authentication</p>
Case information provided by family law client	In relation to the personal data of the client, this processing is necessary to provide legal advice under contract with the client and for others it is in the legitimate interests of the client and the firm	Client; former partner; children	Information about the legal issue about which advice is being sought	<ul style="list-style-type: none"> <li>Court department.</li> <li>Solicitor for the other party.</li> <li>Advocate</li> <li>Court</li> <li>Expert witnesses and advisers.</li> <li>Court-appointed reporters.</li> <li>Party litigants.</li> <li>Scottish Legal Aid Board.</li> <li>Cloud based server hosted by third party</li> </ul>	5 years after completion (Law Society Guidance on divorce and Consistorial Matters)	NA – information updated as case progresses	<p>Paper files and locked in a cabinet unless they are in use. Paper files remain in the office unless required for court etc</p> <p>Information is held in our Practice/document management system which is stored in a cloud server hosted by a third party. End user devices which can access the database are encrypted. All special category data is encrypted when it is sent outside the organisation</p>