

## Data Audit

### Customers

Business area	Categories of data subject	Type of personal data	Is the data "sensitive"?	Source of data	Where is the data stored?	Why is the data processed?	Is the data passed to a third party?	What is the lawful basis for processing under the GDPR?	If "legitimate interests": balance of data controller vs data subject rights?	What are the grounds for processing sensitive personal data?	What security measures are in place to protect data?	How long is data held?	Are you satisfied that processing is lawful?
Sales	Cell site owners	Contact details	No	Data subject / Customer	Database & paper files	Lease negotiation and access rights	Customer / professional advisors	Legal obligation / Performance of contract / Legitimate interests	N/A	N/A	Encrypted storage, access controls	Customer dependant - minimum 7 years	Yes
Finance	Cell site owners	Bank account details	No	Data subject / Customer	Database & paper files	Access rights	Customer / professional advisors	Legal obligation / Performance of contract / Legitimate interests / Payments	N/A	N/A	Encrypted storage, access controls	Customer dependant - minimum 7 years	Yes