

**Record of Processing Activities  
(FOR DATA CONTROLLERS)**

This Record of Processing Activities (Record) describes how The Home Consultancy [and its subsidiaries and affiliates in] [the United Kingdom [processes/process] personal data. The Home Consultancy recognizes that Article 30 of the EU General Data Protection Regulation (GDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information, but The Home Consultancy will provide it to the appropriate supervisory authority on request as required by Article 30.

Data Controller Details:

Name: The Home Consultancy

Address: 24 Highfield Avenue

Telephone Number: 07738 067671

Website: [www.thehomeconsultancy.com](http://www.thehomeconsultancy.com)

[Joint controller: Shanti Panchani

[Representative: Shanti Panchani

[Data Protection Officer: Shanti Panchani

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**Categories of Data Subjects**

The Home Consultancy collects personal data from the following categories of data subjects:

- The Home Consultancy customers or consumers.
  - The Home Consultancy vendors or suppliers.
  - The Home Consultancy employees and job applicants.
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## **Categories of Personal Data**

The Home Consultancy collects the following categories of personal data about [customers/consumers]:

- Personal details including name and contact information.
- Family and lifestyle details.
- Device details.
- User activity details and user preferences.
- Browser history details.
- Location details.
- Electronic identification data including IP address and information collected through cookies.
- Financial details.
- Credit card information and payment details.
- Contractual details including the goods and services provided.
- Special categories of personal data including biometric data.]

The Home Consultancy collects the following categories of personal data about employees and job applicants:

- Personal details including name and contact information.
- Date of birth.
- Gender.
- Marital status.
- Beneficiary and emergency contact information.

- Government identification numbers.
- Education and training details.
- Bank account details and payroll information.
- Wage and benefit information.
- Performance information.
- Employment details.
- Special categories of personal data, including data relating to an employee's:
  - racial or ethnic origin;
  - political opinions;
  - religious or philosophical beliefs;
  - trade-union membership;
  - genetics, biometrics or health; and
  - sex life or sexual orientation.]

The Home Consultancy collects the following categories of personal data about vendors or suppliers:

- Name and contact information.
  - Financial and payment details.]
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### **Purposes of Data Processing**

The Home Consultancy collects and processes personal data about [customers/consumers] for the following purposes:

- Maintaining and enhancing The Home Consultancy's products and services.
- Providing products and services and customer management.
- Account management.
- Direct marketing.
- Supporting network and system security.
- Auditing.
- Detecting and preventing fraud.
- Complying with legal obligations.
- Conducting web analytics.]

The Home Consultancy collects and processes personal data about employees and job applicants for the following purposes:

- Recruitment and selection of employees.
- Personnel management.
- Workplace monitoring.
- Human resources administration including payroll and benefits.
- Complying with legal obligations.
- Education, training, and development activities.]

The Home Consultancy collects and processes personal data about vendors or suppliers for the following purposes:

- To obtain products and services.
- Vendor administration, order management, and accounts payable.

- Evaluating potential suppliers.]
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### **Categories of Personal Data Recipients**

The Home Consultancy discloses personal data to the following categories of recipients, some of which [may be in third countries] [or] [may be international organizations as defined in Article 4(26) of the GDPR]]:

- The Home Consultancy parent company, subsidiaries, and affiliated entities, including branches.
- Business partners.
- Auditors and professional advisors, such as lawyers and consultants.
- Federal, state, and local law enforcement officials.
- Third-party service providers, such as providers of:
  - IT system management;
  - information security;
  - human resources management;
  - payroll administration; or
  - retirement plan administration.]

The Home Consultancy transfers personal data to the following [third countries] [and] [international organizations]:

- Germany

The Home Consultancy makes limited personal data transfers subject to the second subparagraph of Article 49(1) which are necessary for The Home Consultancy compelling legitimate interests. The Home Consultancy provides appropriate safeguards for these limited personal data transfers through [contractual clauses]

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## Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, The Home Consultancy only retains personal data for as long as necessary to fulfil the purposes The Home Consultancy collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, The Home Consultancy considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

The Home Consultancy] typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

- [Information about [customers/consumers]:
  - personal details including name and contact information: 1 year;
  - location details: 1 year;
  - contractual details including the goods and services provided: 7 years
  
- [Information about employees and job applicants:
  - personal details including name and contact information: 1 year;
  - date of birth: 1 year;
  - gender: 1 year;
  - marital status: 1 year;
  - beneficiary and emergency contact information: 1 year;
  - government identification numbers: 1 year
  - education and training details: 1 year
  - bank account details and payroll information: 1 year;
  - wage and benefit information: 1 year
  - performance information: 1 year

- employment details: 1 year
  - special categories of personal data, including information that relates to an employee's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics or health, and sex life or sexual orientation: 1 year
  - [Information about vendors or suppliers:
    - name and contact information: 1 year;
    - financial and payment details: 1 year
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### **Technical and Organizational Security Measures**

The Home Consultancy has implemented the following technical and organizational security measures to protect personal data:

- [Pseudonymisation of personal data.
  - Encryption of personal data.
  - Segregation of personal data from other networks.
  - Access control and user authentication.
  - Employee training on information security.
  - Written information security policies and procedures.]
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### **Changes to this Record of Processing Activities**

The Home Consultancy reserves the right to amend this Record of Processing Activities from time to time consistent with the GDPR and other applicable data protection requirements.

#### **Effective Date:**

**21<sup>st</sup> May 2018**

#### **Last modified:**

[DATE]