Records of processing template

A ready to fill register of what personal data you process, why, on what lawful basis, who receives it and how long you keep it.

Records of processing are the foundation of data protection compliance. Fill in one row for each purpose for which you use personal data. Review the register at least once a year and whenever you start a new activity.

Organisation details

Item	Details
Organisation	
Responsible person or DPO	
Date of last review	

Register

Activity or purpose	Categories of people	Categories of data	Sensitive data?	Lawful basis	Recipients	Transfers outside Nigeria	Retention period	Security measures
Payroll	Staff	Bank details, salary, tax ID	No	Contract, legal obligation	Payroll provider, tax authority	No	6 years after leaving	Access limited to HR and finance

The payroll row is an example. Replace it with your own details.

Tips

- Start with the activities every organisation has: staff records, payroll, recruitment, customer or beneficiary records, marketing, website and CCTV.
- Ask each department head to list the spreadsheets, systems and paper files they use.
- If you cannot name a lawful basis or a retention period for an activity, mark it for review.

General guidance only, not legal advice. Adapt it to your organisation. © 2026 EDAN Development & Consulting Ltd.