

## Step 2 DIY Template: 5 Formulas to Build Data Privacy

Created by: Ankit Bhargava

CIPP/E Certified Data Privacy Professional | Freelance EU-Registered Data Protection Officer (DPO)

LinkedIn: [linkedin.com/in/privacybestpractices/](https://www.linkedin.com/in/privacybestpractices/) | Email: [ankit \[at\] privacybestpractices \[dot\] com](mailto:ankit@privacybestpractices.com)

**Instructions:** Have your Step 1 answers ready. Fill in each formula below. Type directly into the fields. Save this document – you will need it for Step 3.

### Formula 1: What Data You Collect & Where Your Customers Live

*"We collect [types of data] from customers located in [customer location]."*

**Your sentence:**

Type your sentence here...

### Formula 2: What Your Customers Actually Expect

*"Our customers expect us to use their information to [main service / purpose]."*

**Your sentence:**

Type your sentence here...

### Formula 3: Your Legal Reason for Collecting Data (Lawful Basis)

*Pick the option that best describes your situation:*

- "Our users have freely given their personal information to us to fulfil [purpose from Formula 2]." (Consent)
- "We need our users' information as part of a contract or under a contractual obligation." (Contract)
- "The law requires us to collect or keep our users' data." (Legal obligation)
- "We have collected the personal information in our company's or business interest." (Legitimate interests – requires balancing test)
- "We are not sure." (Stop here and get help)

**Your sentence (copy the checked option above or type your own):**

Type your legal basis sentence here...

### Formula 4: Where Data Lives, Who Sees It, How Long You Keep It

*"We store our users' personal data in [location]. [Roles] have access to it. We keep it for [time period]. If a customer asks, we can [access / delete / update] their information."*

**Your sentence:**

Type your sentence here...

### Formula 5: Who You Share Data With and Why

*"We share data with [recipients] for [purpose]."*  
*Or if you do not share data: "We do not share this information with any third parties."*

**Your sentence:**

Type your sentence here...

### Your Final 5 Sentences (Summary)

**Formula 1:**

**Formula 2:**

**Formula 3:**

**Formula 4:**

**Formula 5:**

**Next step:** You now have a complete, honest snapshot of your business. Save this document. You will need it for **Step 3: Define Your Privacy Objective.**

### Need Help?

If you got stuck on any formula – especially legal basis – reach out.

**Ankit Bhargava** – CIPP/E, EU DPO  
🔗 LinkedIn: [linkedin.com/in/privacybestpractices/](https://www.linkedin.com/in/privacybestpractices/)  
✉ Email: [ankit \[at\] privacybestpractices \[dot\] com](mailto:ankit@privacybestpractices.com)