

Data Privacy Step 1 DIY Template: Identify, Map, and Document Your Users' Complete Data Flow

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Purpose: Answer these 5 questions honestly, based on what your business actually does today. This becomes your first source of truth for data privacy compliance.

Instructions: Fill in every blank. If you don't know an answer, write "unknown" or "to be determined".

Question 1: Customer Location and Data Collected

Where are your customers located, and what personal information do you actually collect from them?

Customer location (country/region)	Types of personal data you collect (check all that apply)	Do you require this data? (Yes/No)
(e.g., EU, California, UK, etc.)	<input type="checkbox"/> Name <input type="checkbox"/> Email address <input type="checkbox"/> Phone number <input type="checkbox"/> Billing address <input type="checkbox"/> Payment card details <input type="checkbox"/> Health information <input type="checkbox"/> Cookies/browsing behaviour <input type="checkbox"/> Location data <input type="checkbox"/> Government ID <input type="checkbox"/> Other: _____	<input type="checkbox"/> Yes <input type="checkbox"/> No

(add more rows as
needed)

Notes / details:

Question 2: Customer Expectations vs. Reality

What do your customers think you are going to do with their information?

Be honest – what do they expect vs. what you actually do?

What customers expect	What you actually do (if different)	Would they be surprised? (Yes/No)
(e.g., deliver service only)	(e.g., also track behaviour for marketing)	<input type="checkbox"/> Yes <input type="checkbox"/> No

Explanation of gaps:

Question 3: Your Legal Reason (Lawful Basis)

What is your legal reason to collect personal information from customers?

Select one lawful basis for each type of data.

Type of personal data	Lawful basis (check one)	Justification / notes
	<input type="checkbox"/> Consent <input type="checkbox"/> Contract <input type="checkbox"/> Legal obligation <input type="checkbox"/> Legitimate interests	
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If using "legitimate interests", describe your balancing test:

Question 4: The Complete Data Lifecycle

What happens to users' information once you have it?

Think from collection to deletion.

Stage	Description	Who has access?	Storage location (e.g., cloud provider, country)	Retention period
Collection	(how/where you collect)			
Storage	(where it lives)			
Use / processing	(what you do with it)			
Sharing (if any)	(with whom)			
Deletion	(when and how)			

Can you respond to a customer access or deletion request within 30 days? Yes No Unknown

Notes:



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Question 5: Third-Party Data Sharing

Do you share personal information with anyone else?

List every third party.

Third-party name	What data is shared	Why (purpose)	Country where they are based
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Do you have a Data Processing Agreement (DPA) with each? Yes No In progress

If you do NOT share data with anyone, write "NONE" here:

Summary: Your First Source of Truth

After completing all five questions, review your answers. You now have a raw data map.

Next step: Go to Data Privacy Step 2 – Build Your Practical Compliance Plan (using these answers to create your ROPA and compliance roadmap).

For professional one-on-one help:

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