PDPA PROGRAMME PACK · B3

Personal data inventory and data flow map

Fictional organisation, illustrative only, not a client case study. Quillmarrow Supplies Pte. Ltd. (fictional) is invented. All people are shown by role only.

Organisation	Quillmarrow Supplies Pte. Ltd. (fictional)
Document	B3 · Personal data inventory and data flow map
Version	1.0
Date	30 October 2026 (illustrative)
Prepared by	Alex Lew, reviewer and sign-off
Client approver (role)	Head of Operations (DPO)
Label	Fictional organisation, illustrative only, not a client case study

1. What this inventory is for

This inventory gives Quillmarrow a working view of the personal data it collects, uses, stores and shares. The 25 inventory records, PD-01 to PD-25, and the accompanying data flow map support decisions about privacy notices, retention, vendor due diligence, overseas transfers and breach assessment.

The inventory is a starting point, not proof that a particular control is operating. Quillmarrow's appointed Data Protection Officer (DPO), the Head of Operations, should use it with the B2 gap tracker, B8 retention schedule, B9 vendor questionnaire and B11 breach management plan. Where information is missing or based on a description rather than supporting evidence, it should remain open until the relevant owner confirms it.

The inventory also helps staff identify which data and systems may be affected by an incident or an access or correction request. It does not replace an incident assessment, a search for the records relevant to a request, or advice from a Singapore-qualified lawyer.

2. How it was built

The programme's fieldwork uses interviews with process owners, document review and system walk-throughs based on descriptions and screenshots with personal data masked. The inventory groups information by record type and links it to the systems and business activities described in the case file.

No customer database was received and no records were extracted for this inventory. No client personal data was put into AI tools. System locations, configurations and supplier practices that have not been supported by evidence are identified as questions, not presented as verified findings.

The DPO should confirm the relevant entries with the Head of Customer Service, Head of Marketing, HR Manager, IT Manager and other process owners before treating the inventory as complete.

3. How to read the inventory

Each PD record has one row in the inventory table and the workbook. The columns answer the questions the DPO will be asked during a request, an incident or a vendor review:

Column	What it tells you
Record, individuals, data items	What the record is, whose data it holds and which fields are in it. "Confirm" means the fields came from a description, not a system export.
Purpose and collection point	Why the data is collected and where. This drives which B4 notice applies.
Proposed basis	The working view of consent, deemed consent or an exception. It is a point to confirm with a lawyer, not a legal conclusion.
System, access, shared with	Where the data sits, which roles can reach it and which vendors (DV-01 to DV-03) receive it. Used for breach scoping in B11.
Overseas	Whether data leaves Singapore, or "to confirm" where the location is unknown. Used with B10.
Retention ref	The RS line in B8 that will set how long the record is kept.
Owner role and notes	Who keeps the row accurate, and what is still open.

A row is treated as **confirmed** only when the owner has checked it against the system or a masked screenshot and the DPO has recorded the date. Until then it stays **draft**.

4. Key flows in words

The five flows below summarise where information is collected and where it is understood to go. The detailed map and inventory provide the record-level view.

1. **Web-shop orders and returns.** Customers provide account, order and delivery information through the web shop. Fictional ShopCloud holds or processes web-shop information; payment is handled through Fictional PayGate, and Quillmarrow does not see full card numbers. Customer service and returns may involve Fictional Helpdesk and Microsoft 365. Relevant records include PD-01, PD-02, PD-03, PD-06 and PD-12. **Owner:** Head of Customer Service, with the IT Manager for system questions.
2. **Malaysia fulfilment.** Malaysia order and delivery data is shared with DV-01, Tanjung Contoh Logistics Sdn. Bhd., for picking, packing and delivery in Johor. This is an overseas transfer involving PD-11. The reported contract has a confidentiality clause but no data-protection clauses; the DPO should obtain the contract and assess the transfer arrangements. **Owner:** Head of Operations, appointed DPO, with the Warehouse Manager.
3. **Marketing and telemarketing.** Information is collected through B2B account forms, showroom sign-ups and prospect-list activity. Marketing email data is held in Fictional MailBurst; PD-08, PD-09 and PD-10 need clear links between the collection point, choice recorded and later use. The case file does not establish a DNC register-check process for the planned campaign. **Owner:** Head of Marketing.
4. **Recruitment and employment.** Job applications and employee information, including PD-15 to PD-19, are used for recruitment and employment administration. Fictional PeopleDesk is used for HR and payroll, with Microsoft 365 also in the organisation’s system set. The precise routes, access and retention arrangements for each record need owner confirmation. **Owner:** HR Manager.

5. **Showroom, operational and support records.** CCTV footage is recorded on site; visitor records, calls, requests and support activity create further information across PD-07, PD-13, PD-14 and PD-25. Fictional Harbour IT, DV-03, has administrator access to Microsoft 365 and the file server. Its access scope and review evidence need confirmation. **Owners:** Showroom Supervisor for CCTV; Head of Customer Service for calls and requests; IT Manager for DV-03 access.

Fictional ShopCloud is DV-02. Its hosting region is **to be confirmed**; the inventory must not assume that web-shop data is hosted in Singapore or overseas. Any legal questions about transfer safeguards should be confirmed with a Singapore-qualified lawyer.

5. What the inventory shows

- **NRIC or FIN copies:** PD-19 is collected at staff onboarding. The HR Manager should review why copies are needed, who can access them and the proposed retention decision in RS-15.
- **Call recordings:** PD-07 covers sales-line recordings. The case file does not establish what notice callers receive; obtain the current script and recording arrangements before concluding whether a notice is missing.
- **CCTV purpose:** PD-13 was used once for a staff timekeeping dispute outside the stated purpose. Review that use and the stated purpose under G-03; no CCTV signage is reported under G-04.
- **Marketing choices:** the B2B marketing tick-box is reported as pre-ticked, and no consent records are reported for showroom sign-ups. Review PD-08 and PD-09 against G-02.
- **Telemarketing:** PD-10 contains SME owners' mobile numbers, while no DNC register-check process is reported. The Head of Marketing should establish the campaign process under G-11 before use.
- **Website analytics:** PD-24 identifies analytics and cookies. The case file does not establish the tools, data collected or current cookie notice; confirm these before deciding what changes are needed.
- **Retention:** the case file reports no schedule and general indefinite retention. B8 proposes decisions for RS-01 to RS-20, but Quillmarrow must confirm them; the reported CCTV overwrite remains unverified.
- **Vendors and access:** DV-01 receives Malaysia delivery data, DV-02's hosting region is unknown, and DV-03 has administrator access that has not been reviewed. These are evidence and decision gaps under G-07 and G-09.

6. Open questions and owners

Dates are proposed targets for Quillmarrow to confirm.

Question	Owner role	Due
What evidence supports the data flows and hosting, backup and support-access locations for DV-02?	IT Manager	15 December 2026
What data-protection and transfer safeguards apply to DV-01, and how does it retain and delete PD-11?	Head of Operations, appointed DPO	15 December 2026 (G-09)
Who at DV-03 has administrator access, and which access remains necessary?	IT Manager	15 December 2026
Why are PD-19 copies needed, and what access and retention decision should apply?	HR Manager	15 December 2026
What notice is provided for PD-07 call recordings, and what analytics and cookie information applies to PD-24?	Head of Customer Service for calls; Head of Marketing for analytics	30 November 2026
What are the approved purposes, actual overwrite setting and access arrangements for PD-13?	Showroom Supervisor, with IT Manager	15 December 2026

7. Maintenance

The DPO owns the inventory and should review it with process owners at least annually. The relevant owner should tell the DPO before a **new system, vendor or collection point** is introduced, or when an existing purpose, data flow, overseas location or access arrangement changes.

For each change, update the affected PD record, owner, system, recipient, location and evidence status. Check whether notices, B8 retention decisions, B9 vendor questions, B11 breach planning or the B2 tracker also need updating. Record the date and owner of the review; leave unresolved questions visible until supported by evidence.

8. Status and sign-off

Item	Status
Version	v1.0, working draft for owner confirmation
Prepared by	Alex Lew, for the appointed DPO
Owner	Head of Operations, appointed DPO
Confirmed rows	None yet. Each owner confirms their rows by 30 November 2026
Next review	After the owner confirmations, then at least annually or on any change listed in section 7

Data flow map

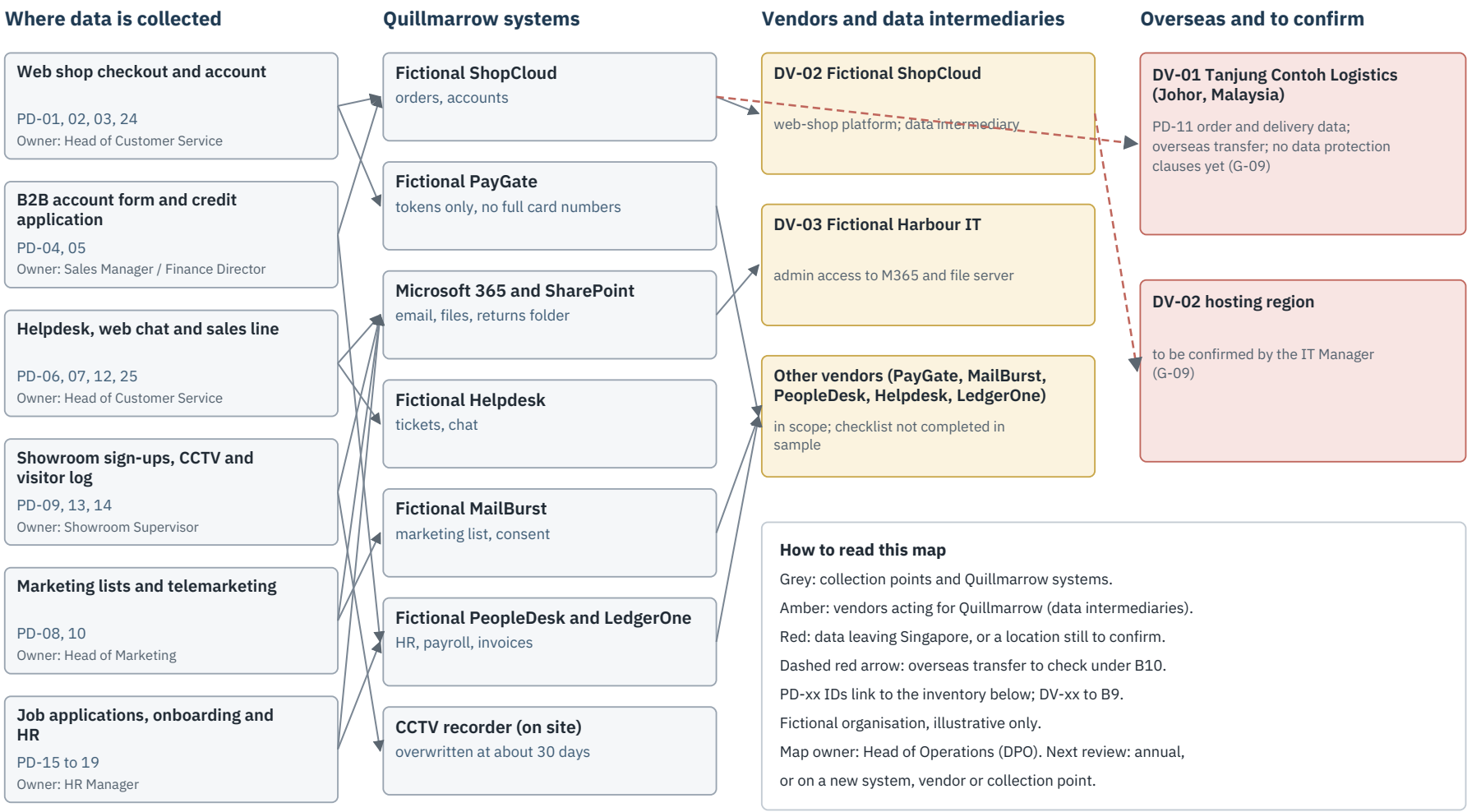


Figure: main flows from collection points to systems, vendors and overseas recipients. Client-reported; owner Head of Operations (DPO).

Inventory, part 1: what is held and why

ID	Record	Individuals	Data items	Purpose	Collected at	Basis
PD-01	Web-shop customer accounts	Web-shop customers (individuals)	Name, email address, telephone number, account credentials and saved preferences; confirm the fields held.	Create and manage customer accounts and support web-shop orders.	Fictional ShopCloud account registration and account updates.	Deemed consent — account functions; confirm the details with a Singapore-qualified lawyer.
PD-02	Web-shop orders and delivery details	Web-shop customers and delivery recipients (individuals)	Customer and recipient names, delivery addresses, telephone numbers, email addresses, items ordered, order dates, delivery instructions and order status; confirm the fields held.	Process orders, arrange delivery, handle customer service and maintain order records.	Fictional ShopCloud checkout and subsequent customer or delivery updates.	Deemed consent — order and delivery processing; confirm the details with a Singapore-qualified lawyer.
PD-03	Card payment tokens and payment status	Customers paying by card (individuals)	Payment token, transaction reference, payment status and amount; Quillmarrow does not see full card numbers.	Record payment outcomes and reconcile orders and payments.	Payment processing through Fictional PayGate during web-shop checkout.	Deemed consent — payment for an order; confirm the details with a Singapore-qualified lawyer.
PD-04	B2B account contacts	Employees and other contact persons of B2B customers	Contact name, job title, business email address, business telephone number and account correspondence; confirm the fields held.	Manage business accounts, orders, service and account communications.	B2B account application, sales interactions and subsequent account updates.	Business contact information — for business communications; confirm classification with a Singapore-qualified lawyer where uncertain.
PD-05	B2B credit applications	Directors, guarantors and contact persons of B2B applicants	Director and guarantor names, contact details, business roles, application information and supporting credit documents; confirm the fields and documents held.	Assess and administer applications for B2B credit.	Credit application and supporting documents submitted to Quillmarrow.	Exception (to confirm with lawyer) — confirm the appropriate basis and handling of director and guarantor information.
PD-06	Helpdesk tickets and web-chat transcripts	Customers, B2B contacts and other people contacting Customer Service	Names, contact details, enquiry or complaint text, order references, attachments and chat messages; confirm whether tickets include other sensitive details.	Respond to enquiries, complaints, service issues and order-related requests.	Fictional Helpdesk ticket submissions, web chat and Customer Service entry of telephone or other enquiries.	Deemed consent — handling a service enquiry; confirm the details with a Singapore-qualified lawyer.
PD-07	Customer call recordings (sales line)	Customers and B2B contacts calling the sales line	Voice recording, caller telephone number where captured, call time and related sales discussion; confirm the recording configuration.	Support sales administration and review customer interactions, as applicable; confirm the specific purposes.	Calls to the sales line, if recorded.	Consent — recording notice and consent evidence were not supplied; confirm the process with a Singapore-qualified lawyer.
PD-08	Marketing email list (Fictional MailBurst)	Individuals and B2B contact persons who receive marketing emails	Name, email address, subscription or suppression status, consent source and date where recorded; confirm the fields held.	Send marketing emails and maintain subscription and suppression records.	Web-shop or other sign-up forms, B2B account interactions and list imports; confirm each source and the consent records.	Consent — retain evidence of the person's marketing choice; address the pre-ticked B2B form and missing showroom records under G-02.
PD-09	Showroom sign-up cards and loyalty sign-ups	Showroom customers and loyalty-programme participants (individuals)	Name, contact details, sign-up date, loyalty account details and marketing choice; confirm the fields collected.	Administer loyalty sign-ups and, where chosen, send marketing communications.	Paper sign-up cards and loyalty sign-up interactions at the showroom.	Consent — showroom consent records were not supplied; confirm the sign-up and record-keeping process under G-02.

ID	Record	Individuals	Data items	Purpose	Collected at	Basis
PD-10	Telemarketing prospect list (SME owners, mobile numbers)	SME owners and other prospective business contacts	Name, business name, mobile telephone number, business role, source and DNC screening status; confirm the fields and source.	Identify and contact prospective SME customers by telephone.	Prospect research, business enquiries and list acquisition; specific sources not supplied.	Business contact information — where the details qualify as such; confirm with a Singapore-qualified lawyer, particularly for mobile numbers and campaign use.
PD-11	Malaysia delivery records (shared with Tanjung Contoh Logistics)	Customers and delivery recipients for Malaysia orders	Recipient name, delivery address, telephone number, order reference, parcel details and delivery instructions; confirm the fields sent.	Pick, pack and deliver Malaysia orders and resolve delivery issues.	Customer order and delivery information submitted through the web shop or provided to Customer Service.	Deemed consent — order fulfilment and delivery; confirm the details with a Singapore-qualified lawyer.
PD-12	Returns and warranty claims	Customers and B2B contacts making returns or warranty claims	Name, contact details, order or invoice reference, returned items, claim description, correspondence and resolution; confirm the fields held.	Assess and resolve returns, refunds and warranty claims.	Web-shop return or warranty request, customer correspondence and Customer Service interactions.	Deemed consent — handling a return or warranty claim; confirm the details with a Singapore-qualified lawyer.
PD-13	Showroom CCTV footage	Showroom visitors, customers and staff captured by cameras	Video images, date and time, camera location and associated incident footage; no audio recording was specified.	Showroom security and incident review, as stated; confirm the documented purposes.	CCTV cameras operating in the showroom.	Exception (to confirm with lawyer) — confirm the applicable basis, notice and permitted use.
PD-14	Visitor log (warehouse and office)	Visitors to the warehouse and office	Visitor name, organisation, visit date and time, host and sign-in or sign-out details; confirm the fields collected.	Record and manage visitor access to the warehouse and office.	Visitor sign-in at the warehouse or office reception.	Deemed consent — visitor entry and sign-in; confirm the details with a Singapore-qualified lawyer.
PD-15	Job applicants (CVs, application form)	Job applicants	CV and application details, name, contact details, employment and education history and any supporting material submitted; confirm the fields received.	Receive and assess applications for employment.	Job application form, CV submission and related recruitment correspondence.	Exception (to confirm with lawyer) — confirm the appropriate basis and notice for recruitment information.
PD-16	Employee HR records	Employees	Employment and contact details, role, employment history, performance and leave records, and HR correspondence; confirm the records held.	Administer employment and manage the employment relationship.	Recruitment, employee onboarding, HR processes and employee updates.	Exception (to confirm with lawyer) — confirm the appropriate basis for employment administration.
PD-17	Payroll and CPF records	Employees	Employee identifiers, salary and payment details, payroll calculations and CPF-related records; confirm the fields held.	Administer payroll and CPF-related processes.	Employee onboarding and changes submitted to HR or Finance for payroll processing.	Exception (to confirm with lawyer) — confirm the appropriate basis and handling of payroll records.
PD-18	Employee medical certificates and leave	Employees	Medical certificates, leave dates, leave type and related HR correspondence; confirm whether records include additional medical details.	Administer and record employee leave.	Employee submission to HR or the designated leave process.	Exception (to confirm with lawyer) — confirm the appropriate basis and access restrictions for health-related information.
PD-19	Staff NRIC or FIN copies	Employees	Copies of NRIC or FIN documents and associated identity details.	Purpose not sufficiently evidenced; confirm why copies are collected and retained.	Employee onboarding.	Exception (to confirm with lawyer) — necessity and appropriate handling of NRIC or FIN copies require review.

ID	Record	Individuals	Data items	Purpose	Collected at	Basis
PD-20	Microsoft 365 mailboxes and staff user accounts	Employees and people whose information appears in staff correspondence	Staff names, business email addresses, account identifiers, mailbox content, attachments, calendar entries and collaboration records; confirm scope and account fields.	Provide business email, collaboration and user access.	Creation of staff user accounts and use of Microsoft 365 email, SharePoint and Teams.	Exception (to confirm with lawyer) — confirm the appropriate basis and employee information practices.
PD-21	System access and audit logs	Employees, administrators and users whose activity is logged	User or administrator identifier, login and access events, timestamps, system or resource accessed and recorded administrative actions; confirm log fields and coverage.	Support security monitoring, investigation and accountability for system access.	Automatic logging by Microsoft 365 and other systems; confirm which systems generate and retain logs.	Exception (to confirm with lawyer) — confirm the appropriate basis and staff information practices.
PD-22	Supplier contact persons	Employees and other contact persons of suppliers	Contact name, business email address, business telephone number, organisation, role and supplier correspondence; confirm the fields held.	Manage supplier relationships, orders and operational communications.	Supplier onboarding, purchasing interactions and supplier correspondence.	Business contact information — for supplier business communications; confirm classification with a Singapore-qualified lawyer where uncertain.
PD-23	Debt-collection and disputed-invoice files	B2B contacts, directors, guarantors and other individuals named in disputed or overdue account files	Names, contact details, account and invoice references, amounts due, dispute details, correspondence and collection actions; confirm the fields held.	Manage overdue invoices, resolve disputes and document collection activity.	Invoice and account records, Customer Service or Finance correspondence, and collection activity.	Exception (to confirm with lawyer) — confirm the appropriate basis and any disclosure or collection arrangements.
PD-24	Website analytics and cookies	Website visitors and web-shop users	Cookie identifiers, online activity and device or browser information; confirm whether data is identifiable and which analytics fields are collected.	Measure website use and operate website functions; confirm each cookie and analytics purpose.	Fictional ShopCloud website and web-shop cookies or analytics tools.	Not applicable (to confirm) — confirm whether collected information is personal data and the applicable notice or choice process.
PD-25	Complaints and access or correction request records	Customers, B2B contacts, employees and other people making complaints or data requests	Name, contact details, request or complaint, identity-verification material where collected, correspondence, response dates and outcome; confirm the fields recorded.	Receive, assess, track and respond to complaints and access or correction requests.	Customer Service, DPO or other staff channels, including requests forwarded by the Malaysia partner.	Deemed consent — handling a complaint or request; confirm the details with a Singapore-qualified lawyer.

Inventory, part 2: where it lives, who sees it and how long it is kept

ID	System	Access	Shared with	Overseas	Retention	Owner role	Notes and open questions
PD-01	Fictional ShopCloud	Head of Customer Service; authorised Customer Service staff; IT Manager and authorised Fictional Harbour IT administrators.	Fictional ShopCloud (DV-02)	To confirm: hosting region (DV-02)	RS-01	Head of Customer Service	Confirm account fields, hosting region, access and retention trigger; inactive-account retention decision remains open under RS-01 and G-08.
PD-02	Fictional ShopCloud; order-related records may also be held in Fictional LedgerOne and Fictional StockPoint; confirm system flows.	Head of Customer Service; authorised Customer Service staff; Warehouse Manager and authorised warehouse staff; Finance Director and authorised finance staff; IT Manager and authorised Fictional Harbour IT administrators.	Fictional ShopCloud (DV-02); Tanjung Contoh Logistics Sdn. Bhd. (DV-01) for Malaysia deliveries.	Yes: Malaysia (DV-01)	RS-02	Head of Customer Service	Confirm system flows and which delivery fields are sent to DV-01; review applicable retention and disposal decisions under RS-02 and G-08.
PD-03	Fictional PayGate; payment status may be recorded against the order in Fictional ShopCloud; confirm the flow.	Finance Director and authorised finance staff; authorised Customer Service staff for payment-status enquiries; IT Manager and authorised administrators as needed.	Fictional PayGate	No	RS-02	Finance Director	Confirm the token and transaction fields visible to Quillmarrow and any system flow or hosting location not stated in the case file; no full card numbers are held by Quillmarrow.
PD-04	Fictional StockPoint; related correspondence in Microsoft 365; confirm the system of record.	Sales Manager and authorised Sales staff; Head of Customer Service and authorised Customer Service staff; IT Manager and authorised Fictional Harbour IT administrators.	None	No	RS-03	Sales Manager	Confirm the system of record and fields held. The marketing consent tick-box on the B2B account form is pre-ticked; address under G-02.
PD-05	Fictional LedgerOne and related application files in Microsoft 365; confirm the system of record.	Finance Director and authorised finance staff; Sales Manager where needed for account administration; IT Manager and authorised Fictional Harbour IT administrators.	None	No	RS-04	Finance Director	Confirm application fields, access and system location. Retention for declined applications remains to be decided under RS-04 and G-08.
PD-06	Fictional Helpdesk	Head of Customer Service and authorised Customer Service staff; IT Manager and authorised Fictional Harbour IT administrators.	Fictional Helpdesk	No	RS-05	Head of Customer Service	Confirm the provider's hosting and support access, the information submitted in chat and tickets, and retention decisions under RS-05 and G-08.
PD-07	Sales-line recording system; system name and configuration not supplied.	Sales Manager and authorised Sales staff; IT Manager and authorised administrators where required.	None	No	RS-06	Sales Manager	Confirm whether and how calls are recorded, notice provided, access controls and system location. Recording purpose and retention remain to be confirmed under RS-06 and G-08.
PD-08	Fictional MailBurst	Head of Marketing and authorised Marketing staff; IT Manager and authorised administrators as needed.	Fictional MailBurst	No	RS-07	Head of Marketing	Confirm list sources, MailBurst hosting and consent evidence. Pre-ticked B2B marketing consent and missing showroom sign-up records are open under G-02.
PD-09	Paper records and any loyalty system; system name and digitisation process not supplied.	Showroom Supervisor and authorised showroom staff; Head of Marketing and authorised Marketing staff for marketing choices.	None	No	RS-07	Head of Marketing	Confirm fields, storage and whether sign-up choices are separate for loyalty and marketing. No showroom consent records were supplied; see G-02.

ID	System	Access	Shared with	Overseas	Retention	Owner role	Notes and open questions
PD-10	System not supplied; confirm the prospect-list storage location.	Head of Marketing and authorised Marketing staff; Sales Manager and authorised Sales staff if assigned to the campaign.	None	No	RS-08	Head of Marketing	Campaign is planned; no DNC register-check process or standard sender details were supplied. Confirm list source, DNC screening and records before calls begin; see G-11.
PD-11	Fictional ShopCloud and records held by Tanjung Contoh Logistics; confirm any other systems.	Warehouse Manager and authorised warehouse staff; Head of Customer Service and authorised Customer Service staff; Tanjung Contoh Logistics personnel handling fulfilment.	Tanjung Contoh Logistics Sdn. Bhd. (DV-01); Fictional ShopCloud (DV-02).	Yes: Malaysia (DV-01)	RS-20	Warehouse Manager	Overseas transfer to Malaysia is in scope. The partner contract supplied has a confidentiality clause but no data protection clauses; review under G-09 and confirm partner-held retention under RS-20.
PD-12	Fictional Helpdesk and Fictional ShopCloud; confirm system flows and any shared files.	Head of Customer Service and authorised Customer Service staff; Warehouse Manager and authorised warehouse staff for returned goods; Finance Director and authorised finance staff for refunds.	Fictional Helpdesk; Fictional ShopCloud (DV-02).	To confirm: hosting region (DV-02)	RS-02	Head of Customer Service	Confirm whether return records are stored in the SharePoint folder involved in INC-2026-07 and any platform hosting locations. RS-02 covers order records; a distinct returns retention decision may need to be added under G-08.
PD-13	Showroom CCTV recorder (on site)	Showroom Supervisor; IT Manager or authorised Fictional Harbour IT personnel only where access is required and authorised.	None	No	RS-09	Showroom Supervisor	CCTV is reported by Quillmarrow to overwrite at about 30 days; verify the setting. No CCTV notice was supplied, and footage was once used for a staff timekeeping dispute outside its stated purpose; see G-03, G-04 and G-08.
PD-14	Visitor log; format and storage system not supplied.	Warehouse Manager and authorised warehouse staff; relevant office host or reception staff.	None	No	RS-10	Warehouse Manager	Confirm whether the log is paper or electronic, its fields, notice and storage location. Retention decision remains open under RS-10 and G-08.
PD-15	Application form and recruitment files; system not supplied. Related correspondence may be in Microsoft 365.	HR Manager and authorised HR staff; hiring manager for the relevant vacancy; IT Manager and authorised administrators where needed.	None	No	RS-11	HR Manager	No privacy notice was supplied at the job application form; address under G-04. Confirm recruitment system, access and retention for unsuccessful applications under RS-11 and G-08.
PD-16	Fictional PeopleDesk and Microsoft 365; confirm the system of record and file locations.	HR Manager and authorised HR staff; employee's line manager for relevant employment matters; IT Manager and authorised Fictional Harbour IT administrators.	Fictional PeopleDesk	No	RS-12	HR Manager	Confirm the record categories, PeopleDesk hosting and access arrangements. Post-exit retention and disposal decisions remain open under RS-12 and G-08.
PD-17	Fictional PeopleDesk and Fictional LedgerOne; confirm the systems and data flows.	Finance Director and authorised finance staff; HR Manager and authorised HR staff; IT Manager and authorised Fictional Harbour IT administrators.	Fictional PeopleDesk	No	RS-13	Finance Director	Confirm payroll and CPF data flows and access. Accounting or tax retention periods must be confirmed with an accountant or lawyer; see RS-13 and G-08.
PD-18	Fictional PeopleDesk and HR files; confirm the system of record.	HR Manager and specifically authorised HR staff; line manager only for necessary leave administration; IT Manager or authorised administrators only where required.	Fictional PeopleDesk	No	RS-14	HR Manager	Confirm the data fields, restricted access and PeopleDesk hosting. Retention and disposal decision remains open under RS-14 and G-08.
PD-19	Onboarding files; storage system not supplied.	HR Manager and specifically authorised HR staff; IT Manager or authorised administrators only where required.	None	No	RS-15	HR Manager	Necessity of collecting and retaining full NRIC or FIN copies is to be reviewed; confirm storage, access and disposal under RS-15 and G-08.

ID	System	Access	Shared with	Overseas	Retention	Owner role	Notes and open questions
PD-20	Microsoft 365 (email, SharePoint and Teams)	Employees for their authorised accounts and shared workspaces; IT Manager and authorised Fictional Harbour IT administrators.	Fictional Harbour IT (DV-03)	No	RS to be added	IT Manager	No matching retention record for mailbox and collaboration content is listed in RS-01 to RS-20; add a retention decision. Review privileged access under G-07 and link-sharing controls under G-02/ G-07 as applicable.
PD-21	Microsoft 365 and relevant business systems; exact log sources not supplied.	IT Manager and specifically authorised Fictional Harbour IT administrators; other access only where authorised for investigation.	Fictional Harbour IT (DV-03)	No	RS-18	IT Manager	Confirm log sources, fields, administrator access and retention configuration; retention decision remains open under RS-18 and G-08.
PD-22	Fictional LedgerOne and Microsoft 365; confirm the system of record.	Finance Director and authorised finance staff; relevant purchasing staff; IT Manager and authorised administrators as required.	None	No	RS-19	Finance Director	Confirm system of record, fields and any other supplier processing arrangements. Retention decision remains open under RS-19 and G-08.
PD-23	Fictional LedgerOne and related files in Microsoft 365; confirm the system of record.	Finance Director and authorised finance staff; Head of Customer Service and authorised staff where involved in a dispute; IT Manager and authorised administrators as required.	None	No	RS to be added	Finance Director	No dedicated retention record for debt-collection or disputed-invoice files is listed in RS-01 to RS-20; confirm whether RS-02 covers these records or add a retention decision. Confirm any external collection recipient before sharing.
PD-24	Fictional ShopCloud and any analytics tools; tool names not supplied.	Head of Marketing and authorised Marketing staff; IT Manager and authorised administrators as needed.	Fictional ShopCloud (DV-02); analytics recipients not identified.	To confirm: hosting region (DV-02)	RS to be added	Head of Marketing	No matching retention record for analytics and cookies is listed in RS-01 to RS-20; add a decision. Confirm cookie inventory, tools, purposes, data fields and hosting region.
PD-25	Fictional Helpdesk and related correspondence in Microsoft 365; no central request log was supplied.	Head of Customer Service and authorised Customer Service staff; Head of Operations as appointed DPO; relevant record owner for a request; IT Manager and authorised administrators as required.	None	No	RS-16	Head of Operations	No central request log was supplied and one request took 41 days. Establish a process covering AR-01 to AR-06, including partner-forwarded requests; see G-05. Retention decision remains open under RS-16 and G-08.

About this sample

Fictional organisation, illustrative only, not a client case study. Quillmarrow Supplies Pte. Ltd., its people, vendors, findings and dates are invented. Nothing in this document reports a client result.

I personally review and sign off every deliverable. You appoint your own DPO. I support them.

This is practical compliance support, not legal advice. For legal advice, use a Singapore-qualified lawyer.

What's not included

- Acting as your DPO. You appoint your own DPO; I prepare the handover and can support them separately.
- Legal advice, legal contract drafting, representation or a guarantee of compliance.
- Forensic investigation, penetration testing, security engineering or implementing changes in live systems.
- A detailed AI governance review or ISO/IEC 42001 readiness check unless separately scoped.
- Ongoing document upkeep after handover, unless agreed through monthly DPO support.
- Healthcare-sector work or on-site delivery.

Questions about this sample: DM @alewyl1 on X, or ask for a free intro call (coffee chat).