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MNL ADVOCATES LLP

Privacy Evidence Pack Checklist

10 Essential Artifacts for Data Protection Compliance in 2026



Practice Area: Cyber Law, Data Protection & Cyber-resilience

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LOCAL EXPERTISE, GLOBAL TALENT



About This Checklist

Purpose: This checklist helps organisations build a comprehensive privacy evidence pack—the set of documents, logs, and records that demonstrate how you manage personal data in practice. Use it to identify gaps, prepare for audits, and respond to due diligence requests.

How to Use This Checklist

- Review each artifact and assess whether it exists in your organisation
- Mark the status column: ✓ = Complete, ○ = In Progress, ✗ = Missing
- Prioritise missing items based on your risk profile and regulatory requirements
- Assign owners and set review dates for each artifact
- Update when vendors, products, or data flows change

The 10 Essential Artifacts

#	Artifact	What It Should Include	Status
1	Processing Register (ROPA) Record of processing activities	Purpose, legal basis, data categories, recipients, retention periods, security measures, cross-border transfers	<input type="checkbox"/>
2	Privacy Notices Transparency documents	Website, product-specific, employee, and vendor-facing notices; data subject rights explanation; contact details	<input type="checkbox"/>
3	Data Protection Impact Assessments (DPIAs) Risk assessment for high-risk processing	Processing description, necessity assessment, risk analysis, mitigation measures, stakeholder consultation, sign-off	<input type="checkbox"/>
4	Vendor Data Processing Agreements (DPAs) Contracts with processors	Signed DPAs for all processors, sub-processor lists, security commitments, audit rights, breach notification terms	<input type="checkbox"/>
5	Cross-Border Documentation International data transfer records	Transfer mapping (systems, vendors, locations), transfer mechanism (SCCs, adequacy decisions), TIA/Risk assessment	<input type="checkbox"/>

6	Incident Response Plan & Log Breach management records	Response procedures, notification timelines, decision records, incident log with dates, root cause analysis, remediation	<input type="checkbox"/>
7	Data Subject Rights Request Log DSR handling records	Request tracking (access, deletion, portability), response timelines, identity verification records, outcome documentation	<input type="checkbox"/>
8	Data Retention Schedule Retention and deletion policy	Retention periods by data category, legal basis for retention, deletion procedures, periodic review records	<input type="checkbox"/>
9	Security Measures Summary Technical and organisational measures	Access controls, encryption, pseudonymisation, audit logs, backup procedures, penetration test results	<input type="checkbox"/>
10	Training Records Staff awareness documentation	Training materials, attendance records, completion dates, role-specific training, annual refresher records	<input type="checkbox"/>

Additional Considerations for 2026

AI Governance Documentation

#	Artifact	Description	Status
A1	AI Use Register	Tool, purpose, owner, data input types, risk level for each AI tool in use	<input type="checkbox"/>
A2	AI Data Restrictions Policy	Clear rules on what data cannot be entered into external AI tools	<input type="checkbox"/>
A3	AI Vendor Controls	Retention, training use, incident notification, sub-processor documentation	<input type="checkbox"/>

Review Schedule

Recommended Review Cadence

- **Monthly:** Vendor changes, new tools (especially AI), new processing activities, open rights requests, incident log review
- **Quarterly:** High-risk processing review (DPIAs), cross-border transfer review for top vendors, board/leadership privacy report
- **Annually:** Full privacy evidence pack audit, training refresh, retention schedule review, policy updates

Notes

ACTION ITEMS / GAPS IDENTIFIED

NEXT REVIEW DATE & OWNER

Need Help Building Your Privacy Evidence Pack?

MN Legal supports privacy program design, vendor contracting, AI governance, and incident readiness.

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Disclaimer: This checklist is for informational purposes only and does not constitute legal advice. Requirements vary by jurisdiction and specific circumstances. Readers should consult their legal counsel to address specific situations and regulatory concerns.

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