

**FREE WORKING DOCUMENTS**

# Make a start. Keep the work moving.

Seven practical working documents to organise your evidence, assign actions and prepare for a focused privacy review.

18 October 2026 · Seven registers · Fictional examples · Editable workbook

General organising tools, not legal templates, certification or legal advice. Adapt them to your activities and have legal decisions reviewed by a qualified adviser. No fixed retention period or automatic notification deadline is assumed.

## 01 Map one real workflow

Choose an enquiry, application or order. Follow it from collection to deletion. Use the information inventory, then list the suppliers and retention decisions behind it.

## 02 Assign and test

Give each gap an owner and target date in the action plan. Test a rights request, an opt-out and a suspected incident using fictional details. Record the evidence of what worked.

## 03 Review and repeat

Complete the 40-question assessment using the evidence you have gathered. Discuss uncertain decisions with an adviser. Revisit the registers when systems, suppliers or purposes change.

## What is in your pack

The workbook contains instructions, seven blank working registers and a separate Examples tab. Each working table has 50 blank rows. Add rows within the table and check that formatting, filters and dropdowns extend. CSV files contain headings only for use in your approved tool.

## Before you start

Keep completed files in your organisation's controlled storage. Record process names and restricted document references, not ID numbers, passwords, full customer records or incident evidence. Downloads are blank: nothing you enter offline is sent to POPIA Check or a partner.

## TOOL 01 / 07

# Information inventory

Record one row per processing activity so you can explain what you collect, why it is needed, who sees it and when it should be reviewed.

## Put it to work

1. List an actual activity, not just a database. Include paper files, inboxes, exports and staff devices where relevant.
2. Describe categories of people and information. Record special personal information or children's information as a review flag without copying the underlying records.
3. Explain the purpose and proposed lawful ground, then link to the review decision. Consent is not a universal default.
4. Trace internal access, external recipients, storage countries and the retention rule. Link missing evidence to an action owner.

## A useful completion check

A colleague can follow the activity end to end, locate the notice and evidence, and see who owns every unresolved decision.

## Fictional example

|                                        |                                                            |
|----------------------------------------|------------------------------------------------------------|
| Activity reference                     | INV-001                                                    |
| Activity and purpose                   | Website quotation enquiry; prepare a requested quote       |
| People and information categories      | Prospective customer; business contact details and enquiry |
| Collection source and notice reference | Contact form; notice version to check                      |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

A populated register does not validate a lawful ground, cross-border arrangement or special-information exception. Ask an adviser to review uncertain activities.

Reference: POPIA sections 9-18, 19-21, 26-35 and 72.

## TOOL 02 / 07

# Supplier and operator register

Bring service providers, access arrangements and contract checks into one place. Distinguish suppliers acting on your instructions from organisations deciding their own purposes.

## Put it to work

1. Start from the inventory and include cloud tools, outsourced payroll, marketing, IT support and document storage.
2. Record the provider's actual role for each activity. A contract label alone does not settle responsibility.
3. Locate written terms, security obligations, subprocessors and international locations. Record evidence dates and gaps.
4. Verify the incident contact and how access is removed, data returned or deleted when the arrangement ends.

## A useful completion check

Every relevant provider has a named owner, a located agreement and a clear action for any missing security, location or exit evidence.

## Fictional example

|                              |                                                     |
|------------------------------|-----------------------------------------------------|
| Supplier reference           | SUP-001                                             |
| Supplier and service         | Fictional CRM provider; enquiry management          |
| Linked activity references   | INV-001                                             |
| Information and access scope | Business contact details; support access to confirm |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

This is a review register, not an operator agreement. Have the applicable contractual safeguards and transfer arrangements assessed.

Reference: POPIA sections 19-21 and 72.

## TOOL 03 / 07

# Retention and disposal worksheet

Document the reason and trigger for keeping each record category, who approves it and how disposal or restriction will work.

## Put it to work

1. Use record categories rather than one blanket period for the whole business.
2. Record both the period and when the clock starts. Locate the legal obligation or documented justification behind the decision.
3. Cover duplicates, email, devices, archives and backup cycles. Check holds, disputes and restrictions before disposal.
4. Record approval, the disposal method and evidence of completion. Review when the purpose, law or system changes.

## A useful completion check

A person responsible for disposal can identify which records are due, why, and what checks must be completed before acting.

## Fictional example

|                                     |                                                             |
|-------------------------------------|-------------------------------------------------------------|
| Retention reference                 | RET-001                                                     |
| Record category and linked activity | Unsuccessful quotation enquiries; INV-001                   |
| Purpose and required record         | Resolve enquiry and manage justified follow-up              |
| Period and start trigger            | To be determined; start trigger proposed as enquiry closure |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

No universal period is supplied. Confirm applicable legal duties and holds before deletion. Do not assume a request always requires immediate erasure.

Reference: POPIA section 14 and applicable sector record-keeping rules.

## TOOL 04 / 07

# Security incident and decision log

Create a factual timeline for suspected unauthorised access or acquisition and the decisions taken by your Information Officer and response team.

## Put it to work

1. Escalate a suspected compromise immediately through your internal response route. Preserve evidence securely and take appropriate containment steps.
2. Record known facts, timestamps, unknowns and decisions. Keep sensitive evidence outside this summary log with restricted access.
3. Have the responsible team assess notification to the Regulator and affected people as soon as reasonably possible. An operator should immediately notify its responsible party.
4. Use the Regulator's current process and forms where required, record references and updates, then track corrective actions.

## A useful completion check

The response team can reconstruct what happened, when it was escalated, what decisions were taken and what remains outstanding.

## Fictional example

|                                             |                                                      |
|---------------------------------------------|------------------------------------------------------|
| Incident reference                          | INC-EXAMPLE                                          |
| Discovery date and time with zone           | Fictional exercise; no real incident                 |
| Reporter role and secure evidence reference | Service team; restricted exercise note               |
| Known facts and information categories      | Simulated misdirected enquiry email; contact details |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

An active incident must not wait for this worksheet, a completed investigation or the ordinary 48-hour partner referral response. This log does not replace statutory notification or an incident response plan.

Reference: POPIA section 22; Information Regulator security compromise guidance and current notification process.

## TOOL 05 / 07

# Rights request tracker

Track access, correction, deletion and objection requests from receipt to a documented response without exposing the underlying personal information.

## Put it to work

1. Record the request and route it promptly to the responsible owner. Use a reference instead of a name or identity document.
2. Confirm the scope and a proportionate way to verify identity. Ask for only the information needed for verification.
3. Check the applicable POPIA or PAIA procedure, deadline, exceptions and any supplier assistance. Do not assume one deadline fits all requests.
4. Record the decision, secure response, any review route and the evidence that required updates reached relevant systems.

## A useful completion check

Each request has a responsible owner, a confirmed process and target date, plus an auditable response and closure reference.

## Fictional example

|                                 |                                              |
|---------------------------------|----------------------------------------------|
| Request reference               | REQ-001                                      |
| Received date and route         | Fictional exercise; email route              |
| Request type and scope          | Correction of business contact details       |
| Secure identity-check reference | Proportionate verification procedure to test |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

The tracker does not decide whether a request must be granted or what fee, exception or deadline applies. Confirm these for the particular request.

Reference: POPIA sections 23-25 and the applicable PAIA procedure.

## TOOL 06 / 07

# Marketing permission review

Review each campaign's list source, relevant permission or exception and the practical ability to stop unwanted messages.

## Put it to work

1. Record the actual channel and how the audience was collected. Separate service messages from promotional campaigns.
2. Locate evidence for the applicable permission or exception and its conditions. A purchased list or prior enquiry is not automatic permission.
3. Check sender identification, notices and a practical objection or opt-out route. Test the process end to end.
4. Confirm suppression survives re-imports, agency handovers and system changes. Record the review before sending.

## A useful completion check

The owner can explain who may receive the campaign, show the supporting evidence and demonstrate that opt-outs take effect.

## Fictional example

|                                      |                                                               |
|--------------------------------------|---------------------------------------------------------------|
| Campaign reference                   | MKT-001                                                       |
| Purpose and communication channel    | Proposed email newsletter                                     |
| Audience and list source             | Existing enquiry list; not approved for marketing             |
| Applicable rule and review reference | Section 69 review required; enquiry is not blanket permission |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

This is not a consent form or a legal decision engine. Use the current Regulator guidance and applicable forms when assessing the campaign.

Reference: POPIA sections 11, 18 and 69; Information Regulator direct marketing guidance.

## TOOL 07 / 07

# Action and evidence plan

Convert gaps from your registers, assessment or website report into owned actions with completion evidence and a review decision.

## Put it to work

1. Give each action a stable reference and link it to the original finding. Describe the practical consequence of leaving it open.
2. Assign an owner, a reasoned priority and a realistic date. Escalate active exposure or incidents through the urgent response route.
3. Define the evidence that will demonstrate the action worked, not only that a document was created.
4. Have an appropriate reviewer verify the result. Keep blocked items and dependencies visible and revisit changes.

## A useful completion check

Another person can see what must change, who owns it and how completion will be demonstrated.

## Fictional example

|                                      |                                                      |
|--------------------------------------|------------------------------------------------------|
| Action reference                     | ACT-001                                              |
| Source finding or register reference | INV-001 and SUP-001                                  |
| Gap and practical impact             | CRM access and supplier terms not evidenced          |
| Priority and reason                  | High; confirm exposure and restrict access if needed |

The complete example is on the workbook's Examples tab. Keep your own working rows separate.

Completion counts are work progress, not a compliance score. Keep unresolved legal decisions visible even when operational tasks are finished.

Reference: Practical implementation worksheet linked to the eight POPIA processing conditions.

**NEXT STEPS**

# Make the work stick.

## Hold a short evidence review

Bring the inventory, supplier list, proposed retention decisions and action plan. Ask each owner to show evidence, not just a completed status. Use role names and restricted references in shared summaries.

## Test three realistic situations

Use fictional details to follow a rights request, a marketing opt-out and a suspected exposure. Record the time, handovers, unknowns and corrective actions. Escalate a real incident immediately through your response process.

## Keep one action plan

Link assessment findings and website observations to the same action references. Define the outcome, owner and verification evidence. Revisit the registers when staff, systems, suppliers or purposes change.

## Use your free report

The 40-question self-assessment creates a personalised gap report. The separate website check collects public-page evidence. After reviewing a report, you can choose a named partner and explicitly authorise sharing. An ordinary referral asks the partner to contact you within 48 hours; it is not an emergency response service.

[Start the free POPIA assessment](#) | [Check your website](#)

## Sources and editorial scope

AI-assisted practical guidance by POPIA Check. Primary source links checked 18 October 2026. These materials are not presented as a legal partner's reviewed advice. Confirm current requirements with an appropriately qualified adviser.

[POPIA, Act 4 of 2013: processing conditions, operators, rights, marketing and transfers](#)

[Information Regulator: guidance notes, including direct marketing](#)

[Information Regulator: security compromise guidance and current forms](#)

[Information Regulator: PAIA resources](#)

## Use and adaptation

You may adapt the working documents for your own or your clients' internal business use. Retain source and scope notes with shared copies. Do not present the pack as an official Regulator document, certification or legal approval.