

				Insert Registered Legal Entity Name Here							
Document number: PII11				Document Title: <b>PII Accuracy and Quality Policy</b>							
Version: 1.0		Effective Date: 01.01.2025		Document Owner:							
X	Policy		Standard		Procedure		Form		Register		Other

Revision history				
Revision number	Revision Date	Changes	Reviewed by	Process owner

Approvals			
Name	Title	Date	Signature

**Legal Notice (Copyright & Usage Restrictions)**  
(C) 2025 Clarysec LLC. All rights reserved.

This document is the intellectual property of Clarysec LLC. No part may be copied, reused, redistributed, or modified for commercial or implementation purposes without explicit written permission. Unauthorized use is strictly prohibited and may lead to legal action.  
For licensing, contact: [info@clarysec.com](mailto:info@clarysec.com)

## Aligned with standards and regulations

Standard / Regulation	Clause / Control / Article	Applicability	Coverage Type	Comment
ISO/IEC 27701:2025	Clause 7.5; Clause 8.1	Both	Primary	Documented accuracy evidence and operational control
ISO/IEC 27701:2025	Clause 9.1; Clause 10.2	Both	Supporting	Monitoring, nonconformity and corrective action
ISO/IEC 27701:2025	Annex A.1.2.9	Controller	Supporting	Controller processing records
ISO/IEC 27701:2025	Annex A.1.3.2; Annex A.1.3.7	Controller	Primary	Accuracy obligations and correction mechanisms
ISO/IEC 27701:2025	Annex A.1.3.8	Controller	Primary	Correction notification to relevant recipients
ISO/IEC 27701:2025	Annex A.2.2.2; Annex A.2.2.6; Annex A.2.2.7	Processor	Supporting	Processor instructions, support and records
ISO/IEC 27701:2025	Annex A.2.3.2	Processor	Primary	Processor correction support
GDPR	Article 5(1)(d); Article 5(2)	Controller	Primary	Accuracy and accountability
GDPR	Article 16	Controller	Primary	Rectification
GDPR	Article 19	Controller	Primary	Recipient notification
GDPR	Article 24	Controller	Supporting	Controller measures
GDPR	Article 28	Both	Supporting	Processor assistance and instructions
GDPR	Article 30	Both	Supporting	Processing records
ISO/IEC 29100:2020	Clause 5.7	Both	Primary	Accuracy and quality principle
ISO/IEC 29151:2022	Annex A.8	Both	Primary	PII accuracy and quality controls

## 1. Scope

1.1 This policy defines requirements for maintaining the accuracy, completeness, currency, adequacy and relevance of PII processed within the PIMS scope.

1.2 This policy applies to controller, joint controller, processor and subprocessor contexts. Controller obligations are primary. Processor and subprocessor obligations apply where the organization supports controller correction, synchronization or accuracy-related instructions.

### 1.3 This policy covers:

1.3.1 accuracy responsibility by processing activity;

1.3.2 accuracy checks at collection, import, source change and review points;

1.3.3 correction triggers and validation;

1.3.4 stale data review for high-impact records;

1.3.5 synchronization of approved corrections across relevant systems and downstream parties;

1.3.6 processor and subprocessor correction support;

1.3.7 evidence in REG02, REG06, REG08 and REG12.

1.4 This policy does not establish a separate data quality programme, data quality register, master data governance function, analytics data quality framework or AI training-data quality framework.

### 1.5 This policy does not replace:

1.5.1 PII03 for processing inventory, purposes, lawful basis and REG02 ownership;

1.5.2 PII06 for PII principal rights request intake, identity verification, statutory response handling and closure communications;

1.5.3 PII10 for retention, erasure, deletion and disposal execution;

1.5.4 PII12 for processor, subprocessor and third-party lifecycle governance;

1.5.5 PII14 for PII security and access controls;

1.5.6 PII18 for PIMS-wide monitoring, audit, nonconformity, corrective action and improvement governance.

1.6 For this policy, a high-impact record is a PII record used to grant, deny, modify or materially affect access to a service, contract, employment matter, financial outcome, health-related outcome, eligibility decision, identity decision, risk decision or other decision where inaccurate PII could materially affect a PII principal.

## 2. Purpose

2.1 The purpose of this policy is to ensure that PII used by the organization remains accurate and fit for the processing purposes recorded in the PIMS, and that inaccurate, incomplete, outdated or disputed PII is corrected, synchronized or escalated using controlled evidence.

## 3. Objectives

### 3.1 The objectives of this policy are to:

3.1.1 assign accuracy responsibility for each relevant processing activity;

3.1.2 define lean and testable accuracy checks without creating a separate data governance programme;

3.1.3 establish clear triggers for correction, stale data review and synchronization;

3.1.4 support PII principal correction requests without duplicating the rights request workflow;

3.1.5 support processor and subprocessor correction assistance under documented instructions;

3.1.6 retain evidence in REG02, REG06, REG08 and REG12;

3.1.7 escalate recurring, overdue or high-impact accuracy issues through the PIMS corrective action process.

## **4. Policy Statements**

### **4.1 Accuracy ownership and accuracy requirements**

- 4.1.1 [Controller] The Process Owner / Business Owner MUST record the accuracy owner, authoritative source, high-impact record flag and accuracy review frequency for each controller processing activity in REG02 before processing begins and within 10 business days of material processing change.
- 4.1.2 [Joint Controller] The Vendor / Procurement Owner MUST record joint-controller accuracy responsibility allocation in REG08 and link it to the affected REG02 processing activity before joint-controller processing begins.
- 4.1.3 [Processor] The Vendor / Procurement Owner MUST record customer correction-support obligations and the authorized instruction channel in REG08 before processor service onboarding and within 10 business days of material contract change.
- 4.1.4 [Both] The Process Owner / Business Owner MUST define minimum accuracy checks for each PII category used in an assigned processing activity in REG02 before processing begins and annually thereafter.
- 4.1.5 [Controller] The Process Owner / Business Owner MUST classify high-impact records in REG02 before controller processing begins and annually thereafter.
- 4.1.6 [Both] The Privacy Lead / PIMS Manager MUST review REG02 accuracy ownership, high-impact flags and review cadence quarterly and record unresolved gaps in REG12 within five business days of review completion.

### **4.2 Accuracy checks and stale data review**

- 4.2.1 [Controller] The Process Owner / Business Owner MUST record completion of the defined accuracy check in REG02 before newly collected PII is used for active controller processing.
- 4.2.2 [Controller] The Process Owner / Business Owner MUST verify the reliability of PII collected from a source other than the PII principal in REG02 before first use and before each material source change.
- 4.2.3 [Both] The Process Owner / Business Owner MUST review active high-impact records in REG02 at least annually and before relying on a high-impact record whose review date is overdue.
- 4.2.4 [Both] The System Owner / Application Owner MUST identify stale data indicators for high-impact system records in REG02 before system go-live and within 30 days of material system change.
- 4.2.5 [Both] The Process Owner / Business Owner MUST record an internal accuracy issue in REG12 within five business days when an accuracy check identifies inaccurate, incomplete, outdated, inconsistent or unsupported PII that was not raised as a PII principal correction request.
- 4.2.6 [Controller] The Privacy Lead / PIMS Manager MUST link each PII principal-originated correction claim in REG06 to the affected REG02 processing activity within five business days of assignment for substantive accuracy review.

[ ... Sections 4.3–8 are not included in this preview. Purchase the full document to access the complete policy content. ... ]

## **9. Exceptions**

### **9.1 Accuracy exceptions**

- 9.1.1 [Both] The Process Owner / Business Owner MUST request an accuracy exception in REG12 before using known unverified, stale or disputed PII beyond the recorded review frequency.

- 9.1.2 [Both] The Privacy Lead / PIMS Manager MUST assess the impact and mitigation of each accuracy exception in REG12 within five business days of request.
- 9.1.3 [Conditional] The Data Protection Officer / Privacy Advisor MUST record advice in REG12 before approval of an accuracy exception involving high-impact records, disputed correction or legal requirement.
- 9.1.4 [All] Top Management MUST approve an accuracy exception affecting high-impact records, unresolved corrections, certification scope or legal obligations in REG12 before the exception takes effect.
- 9.1.5 [Both] The Privacy Lead / PIMS Manager MUST set an expiry date not exceeding 90 days in REG12 for each approved accuracy exception before approval.
- 9.1.6 [Both] The Privacy Lead / PIMS Manager MUST close or reassess each accuracy exception in REG12 within five business days of expiry.

## **10. Enforcement**

### **10.1 Enforcement and nonconformity handling**

- 10.1.1 [Both] The Privacy Lead / PIMS Manager MUST record overdue high-impact review, uncorrected inaccurate PII or missed synchronization as a nonconformity in REG12 within five business days of identification.
- 10.1.2 [Both] The System Owner / Application Owner MUST prevent go-live of a high-impact PII-processing system when REG02 lacks the required accuracy owner, accuracy check method or correction path and record the decision in REG12 before go-live.
- 10.1.3 [Controller] The Process Owner / Business Owner MUST suspend reliance on known inaccurate high-impact PII for material decisions until correction, restriction or approved exception is recorded in REG06 or REG12.
- 10.1.4 [Both] The Vendor / Procurement Owner MUST escalate processor, subprocessor or recipient failure to support an approved correction in REG08 and REG12 within five business days after the support deadline.
- 10.1.5 [All] Top Management MUST require corrective action in REG12 within 10 business days for repeated or prolonged high-impact accuracy failure.
- 10.1.6 [All] The Internal Audit / Compliance Reviewer MUST verify corrective action effectiveness for PII accuracy nonconformities in REG12 at the next scheduled PIMS audit or within 60 days of closure, whichever occurs first.

## **11. Review and Maintenance**

### **11.1 Policy and accuracy-control review**

- 11.1.1 [All] The Privacy Lead / PIMS Manager MUST review this policy in REG12 annually and within 30 days of material legal, processing, system or certification-scope change.
- 11.1.2 [Both] The Process Owner / Business Owner MUST review REG02 accuracy ownership, high-impact classification and review cadence annually and within 30 days of material processing change.
- 11.1.3 [Both] The System Owner / Application Owner MUST review the correction path and synchronization procedure recorded in REG02 annually and within 30 days of material system change.
- 11.1.4 [Both] The Vendor / Procurement Owner MUST review processor, subprocessor, recipient and data-sharing correction-support obligations in REG08 before renewal and within 30 days of material relationship change.
- 11.1.5 [Conditional] The Data Protection Officer / Privacy Advisor MUST review the privacy impact of material policy changes in REG12 before approval.

11.1.6 [All] Top Management MUST approve material changes to this policy in REG12 before publication.

## 12. Related Policies

- 12.1 PII01 - Privacy Information Management System Policy
- 12.2 PII02 - Privacy Roles, Responsibilities and Accountability Policy
- 12.3 PII03 - PII Processing Inventory and Lawful Basis Policy
- 12.4 PII06 - PII Principal Rights Management Policy
- 12.5 PII08 - Privacy by Design and Default Policy
- 12.6 PII09 - PII Collection, Use, Disclosure and Sharing Policy
- 12.7 PII10 - PII Retention, Deletion and Disposal Policy
- 12.8 PII12 - Processor, Subprocessor and Third-Party Privacy Management Policy
- 12.9 PII14 - PII Security and Access Control Policy
- 12.10 PII17 - PIMS Documented Information and Evidence Management Policy
- 12.11 PII18 - PIMS Monitoring, Audit and Improvement Policy

## 13. Reference Standards and Frameworks

13.1 This policy is mapped to the following standards and regulations. The mapping explains how the policy supports the cited requirements and identifies the internal clauses that implement or support them.

### 13.2 ISO/IEC 27701:2025

- 13.2.1 **Clause 7.5; Clause 8.1** - Mapped to documented accuracy requirements, REG02 and REG06 evidence, correction workflow, synchronization workflow, implementation responsibilities and operational controls. Addressed by clauses [4.1.1; 4.1.4; 4.2.1; 4.2.2; 4.2.3; 4.2.4; 4.2.6; 4.3.1; 4.3.2; 4.3.4; 4.3.5; 4.4.1; 4.4.2; 5.1.2; 5.1.4; 5.1.5; 7.1.1; 7.1.2; 7.1.3; 7.1.5; 7.1.6; 7.1.7].
- 13.2.2 **Clause 9.1; Clause 10.2** - Mapped to accuracy monitoring, metrics, nonconformity recording, corrective action, escalation, audit sampling and effectiveness verification. Addressed by clauses [4.1.6; 4.2.5; 4.5.1; 4.5.2; 4.5.3; 4.5.5; 5.1.7; 6.1.1; 6.1.2; 6.1.4; 8.1.1; 8.1.2; 8.1.3; 8.1.4; 8.1.5; 10.1.1; 10.1.5; 10.1.6].
- 13.2.3 **Annex A.1.2.9** - Mapped to controller processing records, accuracy ownership, source, high-impact classification, review frequency and REG02 updates. Addressed by clauses [4.1.1; 4.1.4; 4.1.5; 4.2.1; 4.2.2; 4.2.3; 4.2.4; 4.5.4; 5.1.4; 7.1.1; 7.1.3; 11.1.2].
- 13.2.4 **Annex A.1.3.2; Annex A.1.3.7** - Mapped to determining and fulfilling controller obligations for correction, validation, correction approval, correction implementation, dispute handling and closure evidence. Addressed by clauses [4.2.6; 4.3.1; 4.3.2; 4.3.3; 4.3.4; 4.3.5; 4.3.6; 4.3.7; 7.1.5; 7.1.6; 7.1.7; 9.1.3; 10.1.3].
- 13.2.5 **Annex A.1.3.8** - Mapped to notifying relevant downstream parties and tracking acknowledgement of approved corrections. Addressed by clauses [4.4.3; 4.4.7; 5.1.6; 7.1.4; 8.1.3; 10.1.4; 11.1.4].
- 13.2.6 **Annex A.2.2.2; Annex A.2.2.6; Annex A.2.2.7** - Mapped to processor customer agreement evidence, customer correction-support obligations, authorized instruction channels and processor records. Addressed by clauses [4.1.3; 4.4.4; 4.4.5; 5.1.6; 7.1.4; 10.1.4; 11.1.4].
- 13.2.7 **Annex A.2.3.2** - Mapped to processor means for supporting controller correction obligations under documented instruction. Addressed by clauses [4.1.3; 4.4.4; 4.4.5; 4.4.6; 4.4.7; 5.1.5; 5.1.6; 7.1.4; 10.1.4].

### 13.3 GDPR

- 13.3.1 **Article 5(1)(d); Article 5(2)** - Mapped to accuracy ownership, checks, stale data review, correction, synchronization, evidence, monitoring and accountability records. Addressed by clauses [4.1.1; 4.1.4; 4.1.5; 4.1.6; 4.2.1; 4.2.2; 4.2.3; 4.2.4; 4.2.5; 4.3.2; 4.3.4; 4.4.2; 4.5.1; 6.1.1; 8.1.1; 8.1.2; 10.1.1].
- 13.3.2 **Article 16** - Mapped to validation, approval, implementation and closure of correction items recorded in REG06 and REG02. Addressed by clauses [4.2.6; 4.3.1; 4.3.2; 4.3.3; 4.3.4; 4.3.5; 4.3.6; 7.1.5; 7.1.6; 7.1.7].
- 13.3.3 **Article 19** - Mapped to recipient, processor and downstream correction notification and acknowledgement tracking. Addressed by clauses [4.4.3; 4.4.7; 5.1.6; 7.1.4; 8.1.3; 10.1.4; 11.1.4].
- 13.3.4 **Article 24** - Mapped to controller measures, ownership, governance review, exceptions, escalation and corrective action for accuracy controls. Addressed by clauses [4.1.1; 4.1.5; 4.5.1; 4.5.5; 5.1.1; 6.1.2; 9.1.2; 9.1.4; 10.1.5; 11.1.6].
- 13.3.5 **Article 28** - Mapped to processor and subprocessor correction support, documented instructions, customer-authorized implementation and escalation of support failures. Addressed by clauses [4.1.3; 4.4.4; 4.4.5; 4.4.6; 4.4.7; 5.1.6; 7.1.4; 10.1.4; 11.1.4].
- 13.3.6 **Article 30** - Mapped to processing records used to evidence accuracy ownership, sources, high-impact classifications, system linkages and processing activity updates. Addressed by clauses [4.1.1; 4.1.4; 4.1.5; 4.2.2; 4.2.3; 4.4.1; 4.5.4; 7.1.1; 7.1.2; 11.1.2].

#### **13.4 ISO/IEC 29100:2020**

- 13.4.1 **Clause 5.7** - Mapped to accuracy and quality expectations for accurate, complete, up-to-date, adequate and relevant PII, including source reliability, correction validation and periodic checks. Addressed by clauses [4.1.4; 4.1.5; 4.2.1; 4.2.2; 4.2.3; 4.2.4; 4.2.5; 4.3.2; 4.3.4; 4.3.5; 4.4.2; 8.1.1].

#### **13.5 ISO/IEC 29151:2022**

- 13.5.1 **Annex A.8** - Mapped to PII accuracy and quality controls for collection procedures, source reliability, validation, periodic review, correction and high-impact update mechanisms. Addressed by clauses [4.1.1; 4.1.4; 4.1.5; 4.2.1; 4.2.2; 4.2.3; 4.2.4; 4.2.5; 4.3.2; 4.3.4; 4.4.1; 4.4.2; 4.5.3; 7.1.2; 7.1.3; 11.1.3].