

Halderstone



Training module

PII Processing: Context, Roles & Scope

Define PII processing context, determine controller and processor roles, and set practical PIMS scope boundaries under ISO/IEC 27701



Who decides what in your PII processing, and where does your PIMS actually begin and end?

Overview

A Privacy Information Management System only works if its foundations are defined with precision. Organisations must be clear about what constitutes PII processing in their environment, which roles apply, and where system boundaries sit across internal units and external parties.

This module focuses on the architectural front end of a PIMS: defining processing context in a maintainable way, determining controller and processor roles including joint arrangements, establishing internal accountability models, and formalising scope statements and boundary artefacts that reflect real operations and sourcing structures. The emphasis is on governance clarity that enables consistent decision-making, auditability, and long-term maintainability.



Target audience

- People involved in implementing, operating, or improving a PIMS aligned with ISO/IEC 27701
- Executives and department heads accountable for the effectiveness and performance of a PIMS
- Those responsible for processes, policies, IT systems, risks, and controls related to data protection
- Auditors of ISO/IEC 27701 who want to deepen their understanding of management-side best practices (not audit technique)

Is this module for you?

It is a good fit for you if you...

- need clarity on what counts as PII processing in practice.
- want clean controller and processor role separation.
- need defensible scope boundaries for a PIMS.
- work across internal units or external parties.
- support ISO/IEC 27701 implementation or oversight.

It may be less suitable for you if you...

- are looking for legal interpretation of privacy laws.
- want execution guidance for DPIAs or data subject rights.
- need detailed operational privacy controls.
- already operate a stable, well-defined PIMS scope and role model.

Learning outcomes



Key outcomes

- Describe ISO/IEC 27701 expectations for processing context, roles and scope in a PIMS
- Define a high-level PII processing context that is usable for governance and maintenance
- Determine and justify controller and processor roles for real-world scenarios

Additional capabilities

- Translate external role concepts into an internal accountability model that supports decisions and escalation
- Produce a clear PIMS scope statement with boundaries, interfaces and exclusions
- Identify typical scoping and role pitfalls and set up practical review triggers to keep roles and scope current

Agenda

Defining PII processing context in a way the organisation can maintain

How to describe real PII processing in terms of services, products, channels, locations, and data flows at a level that stays accurate as the organisation changes

Determining the organization's role: controller, processor, joint roles

How to apply practical tests to determine who decides purposes and means versus who acts on instructions, including mixed-role scenarios with platforms, partners, and internal functions

Internal accountability model for privacy roles

How to translate external role concepts into internal ownership, decision rights, escalation paths, and evidence expectations that actually work day to day

External parties and boundary-setting

How to decide what sits inside the PIMS scope versus what is managed through interfaces with suppliers, sub-processors, partners, affiliates, customers, and how to document those choices

PIMS scope statement and boundary artefacts

How to produce a scope statement that is operationally useful and support it with concrete boundary artefacts such as context maps, role registers, interface registers, and exclusion logs

Keeping scope and roles up to date

How to define change triggers and lightweight review routines so scope, roles, and responsibilities remain credible without creating a parallel governance machine

Technology as an enabler

How to use inventories, ticketing links, contract repositories, and AI-assisted summaries to keep processing context current while keeping human judgement in control

Case-based workshop

Applying the learned concepts, methods, and approaches in a realistic case setting

Included materials

Learning materials

- Slide deck
- Participant workbook

Templates & tools

- PII processing context canvas
- Role determination matrix
- PIMS scope statement template
- Interface & dependency register
- In-scope / out-of-scope decision log
- Change trigger checklist for scope/role updates

Confirmation

- Confirmation of participation

Preparation guidance

Assumed background

This module assumes participants can already work with basic privacy and data protection concepts, including:

- What counts as PII/personal data in their operating context
- Common processing lifecycle language (collect, use, share, retain, delete)
- Basic awareness of regulatory drivers and contractual obligations

Preparatory modules

Foundation (depending on background)

Useful if you are new to the underlying concepts

- Data Protection Principles

Supporting (optional)

Helpful but not required to participate effectively

- System Framing

Logistics

Available languages

- English
- German

Standard delivery options

- Virtual live teaching
- Blended learning (e-learning + live)

Bespoke delivery options

- On-site delivery at your place
- Content adapted to your organization



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