

INTRODUCTION TO THE RECORDS OF PROCESSING ACTIVITIES

Increase efficiency and delivery greater value from your data





YOUR SPEAKER



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AGENDA

WHAT IS ARTICLE 30 ASKING FOR?

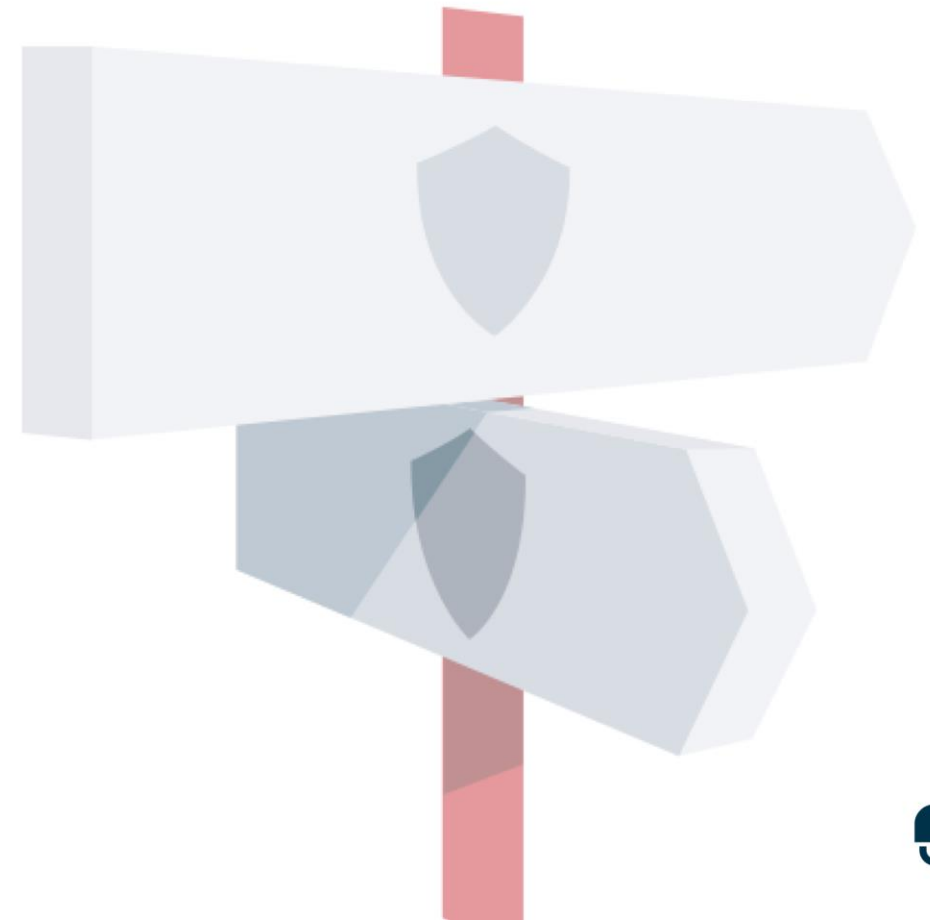
HOW TO IDENTIFY AND DOCUMENT YOUR PROCESSING ACTIVITIES

THE STRUCTURE AND CONTENT OF YOUR ROPA

PARTS OF THE ROPA YOU SHOULD NOT MISS

BEST PRACTICES

Q&A



"Each controller, [...] shall maintain a records of processing activities under its responsibility".

Article 30 , GDPR



+ Accountability principle

"You must have appropriate measures and records in place to be able to demonstrate your compliance."



STEPS TO IDENTIFY AND DOCUMENT YOUR PROCESSING ACTIVITIES



EXPECTED STRUCTURE AND CONTENT

GDPR does not provide information regarding the **format**, however, the content of the RoPA is outlined in the law

Industry standards and set best practices provide a taste on the **structure** of the RoPA (e.g., the use of a privacy software)



Expected content:

- + Information on the data controller, joint controller and EU/UK representative (if applicable)
- + The purpose of the processing
- + The legal basis of processing
- + Description of the categories of data subjects and personal data
- + The recipients of the data
- + Location of the data
- + Retention periods
- + Technical and organisational measures

OUTLINE OF RECORDS OF PROCESSING ACTIVITIES

HR | Personnel file RECORDS OF PROCESSING ACTIVITIES

Information on processing activity pursuant to Art. 30 (1) GDPR

General Information

Controller	Happy People Co
Joint controller	N/A
Data Protection Officer	DataCo International UK Limited (DataGuard)
Supervisory authority	Information Commissioner's Office (ICO)

General Information HR

Type of processing activity	Personnel file
Purpose of the processing	The purposes of processing is documenting and evidencing an existing or terminated employment relationship in accordance with applicable law.
Legal basis of processing	Legal obligation Article 6(1)(c) GDPR used to process (Account details, address, changes in wages and salaries, right to work) Legitimate interest Article 6(1)(f) GDPR - Legitimate Interest Assessment here - used to process (Age, certificates, finale reports in disciplinary proceedings, photo, position with the company)



Purposes of the processing

Categories of data subjects	Employees
Categories of personal data	Account details, Address, Age, Business phone number, Certificates, Credentials, Professional references, Changes in wages and salaries, Citizenship, Resume, Date of birth, Email address, Employee's comments on the content of the personnel file, Employer's notes (for example, on the employee's performance), Employment contract, Final reports in disciplinary proceedings, First name, Gender, Health data, Health insurance membership, Job duties, Job position, Last name, Leadership and performance appraisals, Leave applications and approvals, Letter of termination, Termination agreement, Final certificate, Loans and attachments, Loans and garnishments, Marital status, Medical certificates, Mobile number, National insurance number, Nationality, Number of children, Performance reviews, Phone number, Photo, Position within the company, Reports on accidents at work, Residence permit, Social security number, Surname, Tax ID, Tax ID number, Warning letters

Categories of recipients

Internal recipients of data	HR Partner
Internal recipients of data (on request basis)	Managers, Directors, CEO
External recipients of data	Data Processor (BreatheHR, Google Mail, Blue Sky HR)
Contractual arrangements available	Breathe HR (Terms and Conditions and Data Processing Addendum to be found here) > To review on 20 Jan 2023 Google Mail (Standard Terms and Conditions, no Data Processing Agreement) Blue Sky HR (Terms and Conditions and Data Processing Addendum to be found here) > To review on 01 Sept 2022



Data transfers to third countries or international organisations

BreatheHR processes personal data in Germany - relying on Adequacy Decision

Google Mail processes personal data in Ireland - relying on Adequacy Decision

Blue Sky HR processes personal data in the USA - relying on IDTA (found [here](#)) and the TIA (found [here](#)).

Time limits for erasure

Time limits for erasure of the different categories of data

HR Retention Schedules to be found [here](#)

Technical and organisational measures

Technical and Organisational Measures to be found [here](#)

Information about previous versions

Date modified

DD/MM/YYYY

Subject

Previous version

Modified content

N7A



DON'T MISS OUT ON THESE PARTS



BEST PRACTICES ON MAINTAINING YOUR ROPA

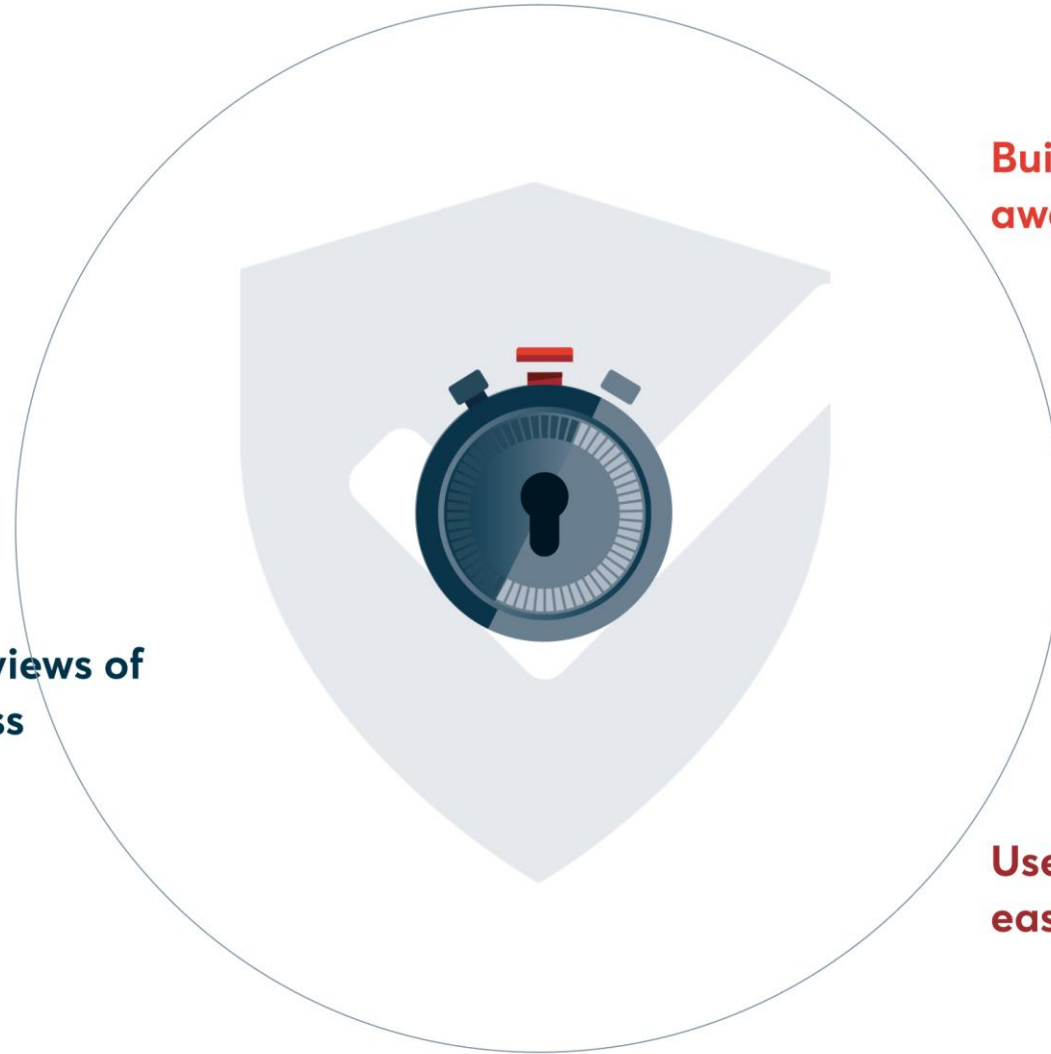
Carry out regular health checks

Conduct regular reviews of the data you process

Build a privacy awareness programme

Involve the privacy team

Use a Privacy Software for easy management





WEBINAR: **GDPR AUDIT**



[dataguard.co.uk/on-demand-webinar/
gdpr-audit-101](https://dataguard.co.uk/on-demand-webinar/gdpr-audit-101)



EXPERT ADVICE TO PREPARE YOUR ROPA

contact@dataguard.com

