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Records of Processing Activities

Understand the privacy context and controls of how data is used

Introduction

Maintaining records of processing activities (ROPA) is a requirement under Article 30 of the EU General Data Protection Regulation. While ROPA isn't an explicit requirement under major regulations such as the California Consumer Privacy Act, the maintenance of ROPA has become instrumental in helping organizations support and understand their compliance posture as their privacy programs grow.

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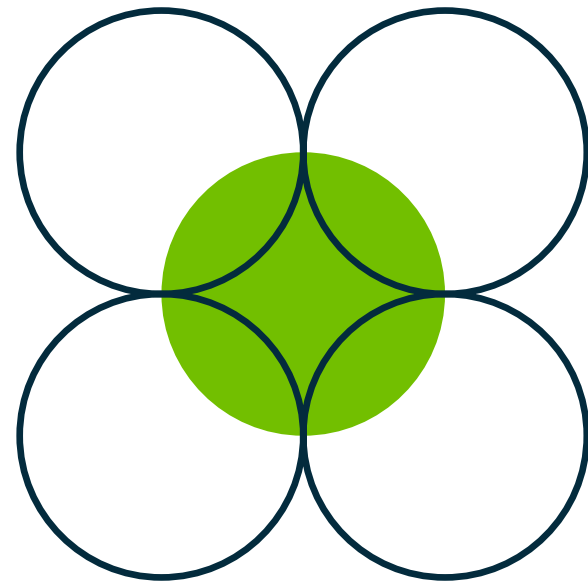
Records of processing activities requirements

Article 30 of the GDPR specifies that organizations must "maintain a record of processing activities under its responsibility" and that the record must include the following:

- Name and contact details of the controller, joint controller, the controller's representative and the data protection officer

- Purposes of the processing

- Categories of data subjects

- Categories of personal data

- Categories of recipients of personal data

- Third parties and organizations in outside countries that are recipients of data transfers

- Safeguards for data transfers

- Time limits for erasure of different categories of data

- Technical and organizational security measures
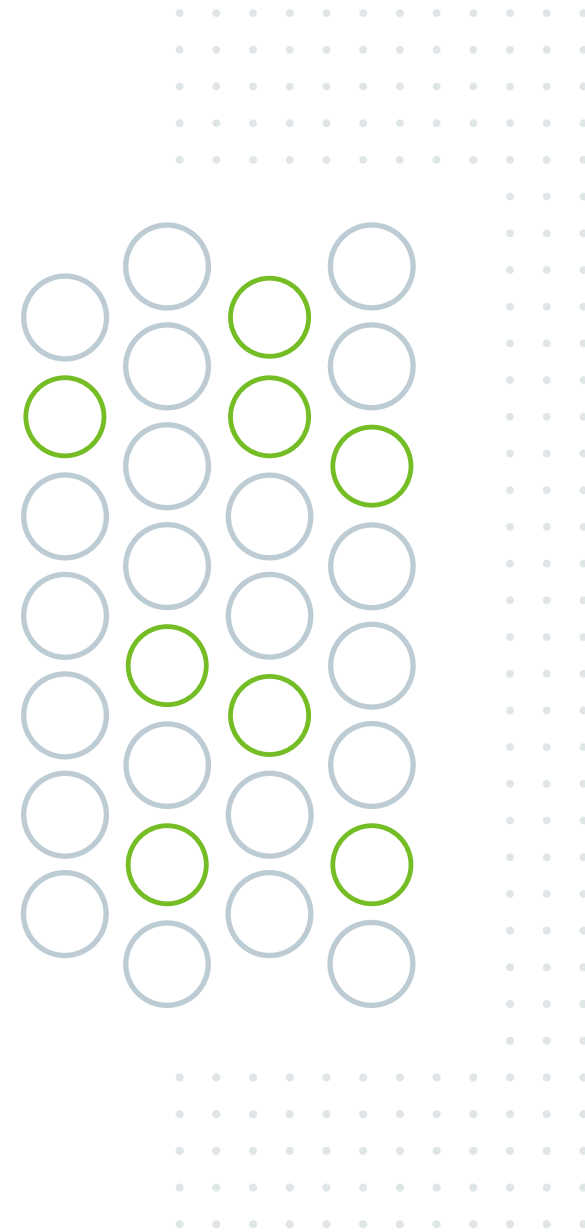
Developing context for privacy

Privacy programs require the full context of the where, what, who, why, when, and how data is used. They also require an understanding of what privacy controls are in place. Documenting ROPA, along with implementing a data discovery process to identify and classify data that's in your data environment, can help organizations gain that full context.

Data discovery determines where data resides, then through classification, identifies what types of data are within the discovered data sources. However, discovered data by itself is limited as the process does not provide additional information to completely describe the where, what, who, why when, and how data is used and protected. ROPA is required to fill those gaps, providing valuable context that enriches information found through the data discovery process.

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Examples of context that would be helpful for privacy programs

Where is customer data stored?

What types of customer data is being stored?

Who is accessing customer data?

Why are they accessing customer data?

How are we safeguarding customer data?

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As the privacy and data regulation landscape continues to grow, the divergence of requirements across different nations and even at the state level within the United States places great importance on the need to understand, map, and track enterprise data. It is more important than ever to know what information you have, what categories of data are being processed, how data flows across the organization, who has access to it, and what protections are in place to ensure only authorized personnel have access to it."

Brett Tarr

Senior Privacy Counsel at Collibra

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Key questions to ask about your ROPA program

- Do you have a view of all the processing activities that your organization has completed?

- Is there a defensible and repeatable process to approve and ensure accurate completion of ROPA?

- Are retention policies being applied and associated with the correct ROPAs?

- Can you rely on your data maps for up-to-date information data flows and cross-border transfers?

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Collibra is the Data Intelligence company. We deliver privacy from a Data Intelligence foundation that centralizes, automates and guides privacy workflows. Privacy by design is embedded ino a single platform, enabling teams across departments to collaborate and operationalize privacy.

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