

# Fact sheet 4:

## The register of processing activities


The **register of processing activities** “register” must be kept by the controller in written or electronic **form**. Its format is free. It allows the controller to document its compliance with the GDPR, which is an important element of the **principle of accountability**.

The **content** of the register must include information on all data processing carried out by the organisation (Art. 30 GDPR). It includes, for each processing operation, in particular the following information, which requires an understanding of **the fundamental principles of the GDPR**:

- the **name** and **contact details of the controller and the DPO** (see fact sheet No 2);
- the **purposes** of the processing. The purpose is the purpose for which the data processing is carried out. The objectives pursued must be chosen and known before the start of the processing (see insert on the purpose criteria);
- the **categories of data subjects**;
- **data categories**. The **principle of minimisation** must be applied. It provides that you must process only those data that are necessary (and not only useful) for the achievement of the purposes;
- **categories of recipients** (including in third countries);
- **data retention periods** (otherwise the criteria to justify this period). The **principle of storage limitation must** be applied, which provides that data must be kept ‘for no longer than is necessary for the purposes for which they are processed’.
- a general description of the **technical and organisational security measures** in place to protect


the data. The **principle of integrity and confidentiality** must be applied, which stipulates that you must ensure the integrity and confidentiality of the data by means of appropriate technical and organisational measures, in particular against unauthorised or unlawful processing and against accidental loss, destruction or alteration of the data.

- where applicable: **data transfers to third countries** (i.e. out of space European Economic Area) and **the contact details of the joint controller**.

 In the event of a request from the CNPD, the register must be made available.

### The purposes must be

- **Determined**: the purpose is effectively to limit processing operations to a specific and predefined purpose.
- **Explicit**: the explanation given must be capable of enabling everyone to understand the purpose pursued, irrespective of the social or linguistic differences that may exist between individuals.
- **Legitimed**: The use of personal data for the purposes indicated **must be in accordance with the law**.

 Personal data must not be further processed in a manner incompatible with the purposes initially determined (Art. 5(1)(c) GDPR).