

INSTRUCTIONS FOR LIST OF PROCESSING ACTIVITIES

1. In general

According to [EU Data Protection Regulation 2016/679 \(pvrɡ.\)](#) , each responsible party and processor and, as the case may be, their representative, keep a record of their processing activities. For information that lists processing activities must include, form of file, accessibility, etc. the provisions of Article 30 shall apply. of the Regulation.

2. Material covers processing activities

The processing list of the *responsible party* shall contain the following information:

1. Name and contact details of the guarantor and, as the case may be, the joint guarantor, a representative of the data protection officer.
2. The purpose of the processing.
Description of categories of registered individuals and categories of personal information.
Categories of recipients who have received or will receive the personal information, e.g. recipients in third countries or international organizations.
5. Where applicable, the disclosure of personal data to third countries or international organizations, including about which third country or international organization and, in the case of mediation referred to in another subparagraph 1 Article 49 pvrɡ., data on appropriate protection measures.
6. If possible, the proposed time limit for deleting different data categories.
7. If possible, a general description of the technical and organizational security measures in question referred to in the first paragraph. Article 32 pvrɡ.

The *processor's processing* file shall contain the following information:

1. Name and contact details of the processor, one or more, and any responsible party
the processor acts on behalf of and, as the case may be, a representative of the guarantor or processor and privacy officer.
2. Categories of processing carried out on behalf of each responsible party.

3. Where applicable, the disclosure of personal data to third countries or international organizations, including about which third country or international organization, and, in the case of a mediation referred to in the second subparagraph of paragraph 1 Article 49 pvrɡ., data on appropriate protection measures.
4. If possible, a general description of the technical and organizational security measures provided referred to in the first paragraph. Article 32 pvrɡ.

It should be noted that the responsible party shall enter into a production contract with each processing party. About content of such processing agreements, reference is made to Article 28. pvrɡ., as well as the [guidelines of the Data Protection Authority](#) in this regard.

3. Our company / organization has less than 250 employees, we need to keep processing file?

Companies and institutions with less than 250 employees are exempt from the obligation to hold processing records for certain processes. The exemption, on the other hand, is very narrow and therefore will be it is rare that it applies entirely to a company or institution.

Thus, companies and institutions with employees under 250 need to keep such a record if the processing is:

1. likely to pose a risk to the rights and freedoms of registered persons;
2. not incidental, or
3. cover specific categories of information, as referred to in paragraph 1. Article 9 pvrɡ. , or personal data relating to criminal convictions and criminal offenses referred to in 10. gr. pvrɡ.

In practice and almost without exception, all companies and institutions must therefore keep records its processing activities.

It is also worth mentioning that companies and institutions will in all cases benefit from mapping them the processing of personal information that takes place there, as part of internal management and documentation.

4. How should we prepare a production file?

There is no formal requirement as to how the processing file should be presented, or what method should be used used in its preparation. Companies and institutions therefore decide on the structure of the register themselves; whether it is done by having a summary in the form of a written document, an Excel document, or otherwise. Must have though note that the requirements regarding the content of process files must be complied with, and care must therefore be taken to is fulfilled regardless of the form used.

The Data Protection Authority has, for example and guidance, prepared a form for the processing file for the responsible party. on the one hand and the processor on the other. They can be used to get the necessary overview. It may be that who the guarantor needs to adapt the file to his / her circumstances, as the guarantor's activities may be very different in size and scope. It is good to keep in mind that the main purpose of the file is to get an overview over the *processing of personal information* that takes place in the business, but not necessarily every single one processing operation performed.

The form for the guarantor contains more columns than is required by law. This is done because that a better overview can be a good tool in the work of ensuring the company's follow-up duties and rights of the data subject. It is then easier to answer questions from individuals who want to receive information about what is recorded about them, where the information came from, and on what basis the source information is processed. The overview is also useful when fulfilling persistent obligation to provide information, for example with regard to privacy policy.