

Record of processing activities

according to Art. 30(1) GDPR

Your entity's logo here

Designation of the processing activity	
Short name	central-dms
Name	Some Entity document management system for human resources
RPA prepared by	Dr. Klöbner
New processing activity	yes
Date introduced	Nov. 1, 2022

Information about the data controller	
according to Art. 30(1)(a) GDPR	
Data controller - Name	Some entity
Data controller - Represented by	The President
Data controller - Street	42 Sesame St.
Data controller - Postal code	54321
Data controller - City	Some city
Data controller - Country	Some state
Data controller - Phone	+43 324 657-0
Data controller - Email	president@some-entity.org
Data controller - Web	https://www.some-entity.org/

Information about the joint controller	
according to Art. 30(1)(a) GDPR	
There is no joint controller.	

Data protection officer contact data	
according to Art. 30(1)(a) GDPR	
DPO - Name	Data Protection Officer
DPO - Street	42 Sesame St.
DPO - Postal code	54321
DPO - City	Some city
DPO - Country	Some state
DPO - Phone	+43 324 657-1234
DPO - E-mail	dpo@some-entity.org
DPO - Web	https://www.some-entity.org/go/dpo

Information about the data processing department at the data controller	
Processing Dept. - Name	Some Entity Central Services
Processing Dept. - Street	42 Sesame St.
Processing Dept. - Postal code	54321
Processing Dept. - City	Some city
Processing Dept. - Country	Some state
Processing Dept. - Phone	+43 324 657-2001
Processing Dept. - E-mail	dowser@some-entity.org
Processing Dept. - Comments	Technical contact is John Dowser of Central Services.

Information about the categories of personal data according to Art. 30(1)(c) GDPR; 'special category' refers to Art. 9 GDPR 'special categories of personal data'		
# 1	Person master data	
# 2	Employment contract data	
# 3	Payment details	
# 4	Health data	Special category: yes
# 5	Religious affiliation	Special category: yes
# 6	Trade union affiliation	Special category: yes
# 7	DMS access and change logs	

Information about the origin of the categories of personal data	
Categories of personal data origin description	Data origins are the data subjects themselves and several data sources outside Some Entity, such as bodies of public prosecutors (clearance certificate).

Information about the purpose and legal basis of the data processing according to Art. 30(1)(b) GDPR and Art. 5(1)(a) GDPR in conjunction with Art. 6(1) GDPR	
Purpose	The document management system will be used to handle all human resources related documents at Some entity.
Legal bases	<ul style="list-style-type: none"> • Art. 9(2) GDPR (as described in the reasons) • Art. 88(1) GDPR plus local legislation (processing of data concerning employees or job applicants for administrative purposes)
Reasons	Relevant local legislation is [...]. Processing Art. 9 data is required for legal purposes of income tax calculation, reintegration and exemption from duty for trade union/staff representation activities.

Information about the categories of data subjects by data category
according to Art. 30(1)(c) GDPR

Employees of Some Entity	1 2 3 4 5 6
System administrators at Central Services	1 2 3 4 5 6 7

Information about time limits for erasure by data category
according to Art. 30(1)(f) GDPR

A data erasure concept exists and is attached to the annex.

Information about categories of recipients by data category
according to Art. 30(1)(d) GDPR

External recipient contact data	Local tax office	Applies to data categories: 3 5
External recipient contact data	Health insurance	Applies to data categories: 3

Information about transfers of personal data to a third country or an international organisation
according to Art. 30(1)(e) GDPR

There will be no transfer of personal data to a third country or international organisation.

Information about groups that have access to personal data by category
due to Art. 5(1)(f) GDPR, Art. 32(4) GDPR

An authorization/role concept exists and is attached to the annex. The concept covers all access groups, their respective access rights and all categories of personal data.

Information about transparency
according to Art. 5(1)(a) and Art. 12 GDPR

Transparency choices	<ul style="list-style-type: none"> Data subjects will be informed online (cf. link in explanation)
Transparency explanation	https://www.some-entity.org/go/dms-privacy

Information about data processors according to Art. 28 GDPR	
Data processor - Name	P. Monty Software PLC
Data processor - Street	23 Endless Loop
Data processor - Postal code	54321
Data processor - City	Some city
Data processor - Country	Some state
Data processor - Contact person	P. Monty Software PLC delivers the DMS software and is assigned with maintenance works. P. Monty does not actually process the data, but may gain knowledge of some data in the context of maintenance works. A data processing agreement has been concluded for this purpose (copy in annex). Contact person at P. Monty is John Eric Chapman <jec@pmonty-software.com>.

Information about privacy impact assessment according to Art. 35 GDPR	
PIA required	no
Reasons for PIA not being required	<ul style="list-style-type: none"> • There is no systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing. • There is no processing on a large scale of special categories of data referred to in GDPR Article 9. • There is no systematic monitoring of a publicly accessible area on a large scale. • The processing operation is not on the "required-list" issued by the competent supervisory authority.

Information about technical and organisational measures according to Art. 30(1)(g) GDPR in conjunction with Art. 32(1) GDPR	
TOM handling choice	The processing activity is in accordance with an existing data security concept (corresponding documents are attached and listed in annex)

Annexes	
Annex No. 1	Categories of personal data detailed description
Annex No. 2	DMS authorization and data erasure concept
Annex No. 3	Some Entity data security concept at https://internal.some-entity.org/data-security
Annex No. 4	P. Monty DPA

Date, Internally responsible person's name (in block letters) and signature