# Guidelines for Data Inventory and Processing Activities Mapping

[organization logo]

[organization name]

## Guidelines for Data Inventory and Processing Activities Mapping

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1. Scope, Purpose and Users

The purpose of this document is to provide guidance to [Company Name] (“The Company”) for establishing and maintaining a record of processing activities.

The users of this document are the Data Protection Officer, and the representatives of the business units responsible for processing personal data.

2. Reference Documents

- [relevant national law or regulation for GDPR implementation]
- [other local laws and regulations]

3. Building a Personal Data Record

3.1. The Purpose of the Inventory or Processing Activities

In order to have a common approach toward providing accountability and compliance with the Company’s processing activities of personal data.

The Inventory of Processing Activities is primarily an internal document that will help employees of the business units to fulfill their accountability responsibility of an organization. Further, in the event of an investigation by the Data Protection Office, it will be a key document that will be reviewed.

The Data Protection Officer is responsible for maintaining a record of the Company’s data processing activities in the form of the Inventory of Processing Activities.

The type of Inventory will depend on whether a company is acting as a Data Controller or as Data Processor.

3.2. Acting as a Data Controller

[Guidelines for Data Inventory and Processing ver (version) from (date)]

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In order to ensure compliance with the requirements or the EU GDPR the following information must be included in the Inventory of Processing Activities:

- The name and contact details of Company’s Data Protection Officer or other responsible person.
- The categories of data processed by the business and the purpose for which the data is processed.
- The types of third parties with whom the personal data will be shared, including recipients, categories of data, purpose of sharing, and the period of time the data is shared for.
- The categories of data that will be shared with third parties.
- The proposed time limits for erasure of the different categories of data.
- Where possible, a general description of the technical and organizational security measures.
- Any third parties on the basis of a decision of the supervisory authority.
- The categories of actions taken to ensure that the above-mentioned information is kept correct and up to date.
- Suitable safeguards for exceptional transferring personal data.

3.3. Acting as a Data Processor

When the Company acts a data processor, it must maintain an Inventory of Processing Activities of all

- The name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller’s or the processor’s representative, and the Data Protection Officer.
- Any third parties the processor shares the data with.
- Any third parties the processor shares the data with the controller.

4. Filling in and Maintaining the Inventory of Processing Activities

The responsibility of filling in the Inventory of Processing Activities rests with each of the Company’s

Each business unit/department will maintain its own Inventory of Processing Activities. For this

Commented [GDPR8]: All these items are required by the EU GDPR – please do not delete any of these.

Commented [GDPR9]: These items are not mandatory, but they are recommended.

Commented [GDPR10]: This will be included in the contract/data processing agreement with the controller.

Commented [GDPR11]: Feel free to delete this paragraph if you are a small company – smaller companies will typically have only one Inventory for their whole organization.

This comment is also valid for larger organizations where the personal data is processed only in a smaller scope.
The responsible person must list all the data that are processed in particular business

The responsible person will regularly report to the Data Protection Officer when adding/deleting new Inventories.

The Data Protection Officer will be responsible to ensure that all business units/departments shall

5. Managing Records Kept on the Basis of this Document

<table>
<thead>
<tr>
<th>Record name</th>
<th>Storage location</th>
<th>Person responsible for storage</th>
<th>Controls for record protection</th>
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<td>Inventory of Processing Activities</td>
<td>Company intranet</td>
<td>Data Protection Officer</td>
<td>Only authorized persons may access the file with precisely defined editing rights; the change history must be maintained.</td>
<td>Permanent</td>
</tr>
</tbody>
</table>

6. Validity and document management

This document is valid as of [date].

The owner of this document is [job title], who must check and, if necessary, update the document at least once a year.

7. Appendix

- Appendix – Inventory of Processing Activities

[job title]
[name]