



## **Langslide**

### **ROPA (Record of Processing Activities) Guidance Note**

Version 1.0

## **PURPOSE**

The controllers and processors must create and maintain the Records of Processing Activities (ROPA) that take place within Rudramsa Systems Pvt. Ltd. (Herein referred to as the Organization, company, etc). This document should include a list of each processing activity of the personal data maintained in a written or electronic format. Whenever the company collects, uses, stores, or transfers such data, it must create or constantly update such records.

## **SCOPE**

This guidance note gives organizations clear and practical instructions on developing and maintaining an ROPA. The list of information that a ROPA includes differs between controllers and processors. The controllers decide why and how the data is collected and processed, while the data processors' primary responsibility is executing the processing on the controller's behalf.

## **DEFINITIONS**

- Controller: The party responsible for determining the purposes and means of processing the Personal Data;
- Data Privacy Officer: Where applicable, an individual or individuals responsible for protecting Personal Data.
- Data Subject: A natural person whose Personal Data is processed by a controller or processor;
- Processor: The party that processes Personal Data on behalf of the Controller

## **ROLES & RESPONSIBILITIES**

The Privacy Officer ensures appropriate security measures are taken to protect Personal Data.

# POLICY

Generally, only organizations with 250 or more employees must maintain a ROPA. However, this requirement may also apply to smaller companies if their processing activity:

- is likely to result in a risk to the rights of affected people (e.g., comprehensive monitoring, use of new technologies)
- is not occasional (e.g., such daily activities as customer management or salary management)
- includes special categories of data (e.g., health data, biometric data) or personal data relating
- to criminal convictions and offenses.

Therefore, it is also obligatory for many small and medium-sized companies to maintain their records.

## BUILDING A PERSONAL DATA RECORD

### The Purpose of the Inventory or Processing Activities

The Inventory of Processing Activities will be used to record and track the Company's processing activities of personal data, enabling a common approach toward accountability and compliance with the provisions of the EU GDPR, and enabling the Company to have a clear view of its processing activities.

The Inventory of Processing Activities is an internal document that will help company employees better understand how and why personal data needs to be processed and how to develop policies and procedures to protect the data. It is an integral part of an organization's accountability and responsibility. Further, in the event of an investigation by the Supervisory Authorities, it will be used to prove that the Company is aware and in control of its data operations.

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 a Data processor. If a company acts as both controller and processor (for different processing activities), then the Company must maintain the Inventory both as a controller and as a processor. (For example, a company acts as a data controller for the personal data of its employees but can act as a processor of email marketing messages on behalf of a client.)

### Acting as a Data Controller

To ensure compliance with the requirements of the EU GDPR, the following information must be included in the Inventory of Processing Activities:

#### Mandatory Requirements

- The name and contact details of the Company's Data Protection Officer or other responsible person.
- The purposes of the processing activities.
- The categories of personal data processed.
- The recipients to whom the personal data has been or will be disclosed, including those in third countries.
- Transfers of personal data to a third country, including identifying the respective third country.
- The proposed time limits for the erasure of the different categories of data.
- Where possible, a general description of the technical and organizational security measures.

#### Recommended Requirements

- Department where the processing activity takes place.
- The name of the system that processes the data.
- If the company is processing personal data with other companies, specify the other company's name ("Joint Controller").
- Suitable safeguards for exceptional transferring of personal data.

## **Acting as a Data Processor**

When the Company acts as a data processor, it must maintain an Inventory of Processing Activities of all categories of processing activities carried out on behalf of a controller, containing at least the following information:

- The name and contact details of the processor or processors and 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.
- The categories of processing are carried out on behalf of each controller. (This can be included in the contract/data processing agreement with the controller)
- Where applicable, transfers of personal data to a third country or an international organization, including identifying that third country or international organization.

## **FILLING IN AND MAINTAINING THE INVENTORY OF PROCESSING ACTIVITIES**

- Filling in the Inventory of Processing Activities rests with each Company's business units/departments.
- For a large organization, each business unit/department will maintain its Inventory of Processing Activities and appoint a person responsible for completing the initial inventory and keeping it current.
- The responsible person must list all the data processed in a particular business unit/department, decide whether this data is considered personal data, and map all personal data to specific processing activities.
- The person responsible will regularly report to the Data Protection Officer when adding/deleting new processing activities or changing existing ones. (This typically happens only when a new product, service, or system is developed or changed; therefore, it does not happen often.)
- The Data Protection Officer will ensure that all business units/departments maintain up-to-date Inventories and act as a single point of contact when the units/departments have difficulties identifying the correct elements to be included in the Inventories.

## MANAGING RECORDS KEPT BASED ON THIS DOCUMENT

Record name	Storage location	The person responsible for storage	Controls for record protection	Retention time
Inventory of Processing Activities	Organization intranet	Data Protection Officer	Only authorized persons may access the file with precisely defined editing rights; the change history must be maintained.	Permanent

# Version Details

Version	Version Date	Description of changes	Created By	Approved By	Published By
Version 1.0	Mar 14 2026	Initial Release	Pronoy	Kartikeya	Kartikeya