

The Data Privacy Chronicles

Edition # 5 – Record of processing activities: Mapping your data landscape.

The Data Privacy Chronicle is a sequence of pragmatic newsletters mainly designed for Data Protection Officers (“DPOs”), privacy leaders and their respective organisations. The aim is simple: to provide you with practical insights, powered by our experience as data protection lawyers and DPO-as-a-Service providers, on emerging topics that shape your role and to help you navigate the growing complexity of regulatory frameworks in the digital era.

This edition focuses on a topic that is often underestimated in practice, despite its central role in effective data governance: **the Record of Processing Activities (ROPA)**

1. The Illusion of Control: Why companies think they understand their data

Most organisations believe they have a reasonable understanding of how personal data flows through their operations. Key systems are known, main processes are documented, and privacy frameworks are in place. However, as organisations grow or reorganise, this visibility naturally becomes more complex.

Even in organisations with mature governance frameworks, the operational reality is often more fragmented than initially perceived. Personal data gradually extends across teams, tools, and processes, often silently. This natural expansion, referred to as **data sprawl**, is not the result of poor governance but of **normal business evolution**.

This does not mean that control is lost, but rather that it becomes distributed. Without that visibility, however, it becomes harder to assess risks consistently, respond to requests efficiently, or ensure alignment across teams.

Many organisations do not struggle because they lack systems or policies, but because they struggle to maintain a coherent understanding of how those systems, tools and processes interact over time. This is where the concept of the Record of Processing Activities (hereinafter “**ROPA**”) becomes particularly relevant.

2. Introducing the ROPA: Bringing structure to the chaos

When visibility becomes fragmented, organisations need a way to reconnect the pieces. Under the General Data Protection Regulation (“**GDPR**”), this role is fulfilled by the ROPA, as set out in Article 30. Although often perceived as a formal requirement, the ROPA is, in essence, a structured map of how personal data is processed across the organisation.

At its core, the ROPA is a structured record of how an organisation uses personal data in its day-to-day activities. It captures the essential elements of each processing activity: what data is used, for what purpose, through which systems, and under whose responsibility. In this way, it translates everyday business operations into a clear and organised view of how personal data is handled in practice.

It brings together key information notably relating to the different processing activities carried out across the organisation, the categories of personal data involved, the purposes for which that data is used, and the systems, tools, teams and roles involved in those processes.

Complexity does not depend solely on headcount. A small company operating within a modern SaaS infrastructure may have more integrations, vendors and automated workflows than a large organisation with centralised systems. Start-ups, scale-ups, NGOs and professional services firms all face the same challenge: personal data spreads quickly across tools, teams and processes.

The ROPA therefore becomes a practical tool for regaining visibility.

Ultimately, the value of a ROPA lies not in its format but in its accuracy and its connection to real operations. It is not a document to be completed once and archived, but a mechanism that brings structure to complexity and helps organisations maintain a coherent picture of their evolving data environment.

This also explains why **the Commission Nationale pour la Protection des Données (“CNPD”) has directed its latest investigations on the ROPA**, as it allows authorities to quickly assess whether the organisation has a sufficiently clear and structured understanding of its processing activities.

3. Thinking in processes, not documents

One of the most common challenges when building a ROPA is deciding how to structure it. This often reflects the way organisations naturally structure their operations and internal responsibilities. **However, a ROPA is not built around tools or organisational charts, but around *processing activities*.**

A processing activity is not a system or a task. It represents a specific way in which personal data is used to achieve a business purpose. In other words, it reflects what the organisation actually does with personal data in practice.

For example, a ROPA should not be structured around tools such as “Salesforce” or “SAP”, but around the business activities they support, such as client relationship management or recruitment management.

Each of these activities may involve multiple systems, teams and data flows. The role of the ROPA is to bring these elements together into a single, coherent framework.

This change in perspective is what transforms a ROPA from a simple inventory of systems into a practical operational tool. Instead of asking “*which tools do we use?*” or “*which department owns this data?*”, the ROPA encourages organisations to ask: *what are the different ways in which we process personal data?* Many ROPAs become difficult to maintain precisely because they are structured around systems that evolve faster than the underlying business activities themselves.

4. What should a ROPA contain?

For a ROPA to be useful, it needs to provide a sufficiently clear and complete picture of how personal data is processed across the organisation. The GDPR does not impose a specific format. Companies often use a specific dedicated GDPR compliance tool or can build internal Excel documents.

Under Article 30 GDPR, organisations are required to document specific information relating to their processing activities. This obligation generally applies to organisations with 250 or more employees but also extends to organisations whose processing activities are not occasional, which in essence makes it mandatory for all entities regardless of their size as even smaller organisations often process personal data on an ongoing basis through activities such as human resources management, client administration, marketing or the use of digital platforms and cloud-based services.

The GDPR requires organisations to maintain records containing key information about each processing activity. This typically includes:

- the purpose of the processing activity,
- the categories of personal data involved,
- the categories of individuals concerned,
- the recipients of the data,
- any international data transfers,
- retention periods, and
- a general description of the security measures applied.

Each of these elements serves a practical purpose by helping organisations understand how data is used, shared, retained and protected across the business.

Taken individually, these elements may appear purely administrative. Together, however, they create a much clearer picture of how personal data moves across the organisation. More importantly, these records allow organisations to connect legal obligations with day-to-day operations.

5. Building and maintaining your ROPA

Once the purpose and value of the ROPA become clear, the next challenge is knowing where to begin. Building a ROPA does not require a perfect or fully mapped data environment from the outset. Rather than being completed in a single exercise, a ROPA typically develops progressively over time.

In many respects, a **ROPA is not built all at once, but gradually uncovered** as organisations gain a clearer understanding of their data environment.

A practical starting point is to focus on the organisation's main business activities and identify where personal data is used. These typically include areas such as human resources, client management, marketing, IT operations or finance, as well as the organisation's core business activities, where personal data is often processed as an inherent part of the services or products offered.

From there, the objective is to progressively map the key processing activities within each of these areas and capture the essential information associated with them.

Building a ROPA often involves engaging with different teams across the organisation. Those closest to day-to-day operations are usually best placed to explain how processes actually work, which systems are used, and how data flows between them.

Rather than aiming for completeness from day one, it is often more effective to start with a limited scope, validate the approach, and expand gradually. Starting gradually also reduces the risk of turning the ROPA into a theoretical exercise disconnected from actual business practices.

However, building the ROPA is only part of the challenge. Organisations evolve continuously: new tools are adopted, workflows change, responsibilities shift and new vendors are introduced. As a result, the way personal data is processed also changes over time.

When the ROPA no longer evolves alongside these changes, gaps begin to appear between documentation and existing workflows. **An outdated ROPA may create a false sense of compliance, particularly where processes, tools or data flows have evolved without being properly reflected in the records.**

This is why maintaining a ROPA depends less on periodic review exercises and more on embedding it into the organisation's operational processes. The introduction of new tools, redesign of workflows or launch of new activities should naturally trigger a review of the relevant processing activities.

Regulatory authorities, including the CNPD, increasingly expect organisations not only to maintain a ROPA, but also to demonstrate that it accurately reflects how personal data is processed across the business.

A ROPA that no longer reflects current operations may create more risk than reassurance. When properly maintained, it evolves alongside the organisation and supports a more consistent understanding of how personal data is used across the business.

6. Recommendations for organisations and their DPOs / privacy leaders

DPO checklist

1. Structure the ROPA around business activities, not systems

A ROPA should reflect how personal data is processed in practice. Organising records around business activities rather than tools or departments makes the ROPA more accurate, scalable and easier to maintain over time.

2. Start with high-impact processing activities

Attempting to document everything at once often creates unnecessary complexity. Many organisations benefit from starting with core activities such as HR management, client administration or vendor management before progressively expanding the scope.

3. Engage operational teams early

Those closest to day-to-day operations are often best placed to explain how personal data is actually used, shared and stored. Building a reliable ROPA therefore requires collaboration beyond the privacy or compliance function alone.

4. Integrate ROPA updates into existing processes

A ROPA should evolve alongside the organisation. Changes such as the implementation of new tools, onboarding of vendors, redesigning of workflows or launch of new projects should naturally trigger a review of the relevant processing activities.

5. Maintain the ROPA as a living reflection of the organisation

An outdated ROPA can create a false sense of compliance. Records should be reviewed regularly to ensure that they continue to reflect operational reality and current data flows.

6. Use the ROPA as a governance and risk management tool

Beyond compliance, the ROPA can support a wide range of activities, including vendor management, data protection impact assessments, responses to data subject requests and internal risk reviews.

How we can help

At Stellan Partners, our Technologies, Data & IP team supports organisations and DPOs in building, reviewing and maintaining effective ROPA frameworks by:

- assisting organisations in identifying and mapping processing activities across the business;
- reviewing existing ROPAs to assess their alignment with actual business practices and GDPR requirements;
- supporting privacy teams in structuring and maintaining ROPAs in a practical and scalable way;
- conducting broader data governance and accountability assessments;
- providing tailored training on operational GDPR implementation and ROPA governance.

If you would like to discuss how your organisation can strengthen its ROPA framework or broader data governance practices, please contact a member of our Technologies, Data & IP team.

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