How do you identify your personal data processing activities?

Identifying the data processing activities that your company carries out in order to complete your record of processing activities is never easy. However, it is often easy to identify, if not all of your data processing activities, at least a very large number of them, by asking simple questions starting with the main data subjects and then the activities specific to your company.

Do you have employees? If yes:

- Are you responsible for the administrative management of your employees?
- Do you have staff representatives?
- Do you have a social fund?
- Do you provide your employees with fixed and/or mobile telephones?
- Have you provided your employees with a professional e-mail service?
- Have you set up collaboration tools (chat, instant messaging, videoconferencing, etc.)?
- Can your employees telework?
- Do you use video surveillance to ensure the security of your premises?
- Have you installed access control to your premises (using a badge system, for example)?
- Have you installed a time clock system to monitor your employees' working hours?
- Have you installed a geolocation system in the company vehicles used by your employees?
- (…)

Do you have customers and/or suppliers? If yes:

- Do you keep a file of your suppliers?
- Do you keep a file of your customers/prospects?
- Do you communicate with them via a website that presents your company/services/products?
- Do you do online sales?

- Have you set up loyalty programs?
- Do you have a customer complaint database?
- (…)

Are you subject to any specific regulations relating to your business? If yes:

- Have you set up a **professional whistleblowing system**? (Sovereign Order no. 1.284 of September 10, 2007 as amended; Law no. 1.362 of August 3, 2009 on the fight against money laundering, terrorist financing and corruption, as amended; Law no.1.457 of December 12, 2017 on harassment and violence at work, as amended; etc.)
- Are you subject to Law no. 1.362 of August 3, 2009 on the **fight against money laundering, terrorist financing and corruption**, as amended?
- Are you subject to Sovereign Order no. 8.664 of May 26, 2021 on **procedures for freezing funds and economic resources** in application of international economic sanctions, as amended?
- Have you put in place measures to prevent the **loss** or **theft** of your **confidential data**?
- Have you set up one or more systems for monitoring, detecting and/or alerting you to **internal and/or external threats**?
- Do you collect information relating to **litigation management**?
- (…)

You are a banking or similar institution, a credit institution or a financial institution:

- Do you collect data relating to customer account management?
- Have you set up a **system for recording telephone conversations in order to trace orders**, in accordance with Sovereign Order no.1.284 of September 10, 2007 as amended implementing Law no.1.338 of December 7, 2007 on financial activities as amended?
- Are you subject to the so-called '**FATCA**' **regulations** and to compliance with the tax obligations imposed on financial institutions under US legislation by the Internal Revenue Service (IRS)?
- Do you collect data relating to the management of credit and loans granted to individuals?
- Do you collect information about securities and other financial instruments?
- (…)

You work in the property sector:

- Do you collect information relating to property management and negotiations?

You are a duly authorized insurance, capitalization, reinsurance or assistance organization:

- Do you collect information relating to the conclusion, management and performance of contracts?

You work in the health sector:

- Do you keep files on your patients?

You are and association or a federation of associations:

- Do you collect data on your members?

(…)