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# Intellectual Property, Media and IT

Legal Flash | Portugal

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- **CNPD provides templates of data processing activities record for data controllers and data processors – art. 30° GDPR**



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## **I. CNPD provides templates of data processing activities record for data controllers and data processors – art. 30° GDPR**

On January 22, the Portuguese National Data Protection Commission (“CNPD”) provided two templates of data processing activities record: one for data controllers and one for data processors, for the purposes of article 30 of Regulation (EU) 2016/679 (“GDPR”).

According to paragraph 5 of article 30, this obligation to keep a record of the processing activities does not apply to enterprises or organizations employing fewer than 250 persons, unless the processing is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data as referred to in article 9 (1) or personal data relating to criminal convictions and offences referred to in article 10.

The two templates can be found at CNPD’s website, and are intended to support companies in the fulfillment of their obligation of conserving a record of all the processing activities under their responsibility, under the said article of GDPR.

According to CNPD, “the processing activities record is an obligation imposed by GDPR to data controllers and data processors. In order to facilitate the fulfillment of such obligation, especially for micro, small and medium-sized enterprises, CNPD provides a template which can be used for that effect”.



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