



SDAIA

الهيئة السعودية للبيانات
والذكاء الاصطناعي
Saudi Data & AI Authority

Personal Data Processing Activities Records Guideline

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Notice

The Guideline does not replace referring to the Personal Data Protection Law, its Implementing Regulations, and relevant rules and decisions to ensure compliance with the Law's provisions and regulations.



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Introduction

In fulfillment of its mandate to raise awareness among entities subject to the provisions of the Personal Data Protection Law the “Law” and its Implementing Regulations, and to enable those entities to understand their obligations under Article (31) of the Law and Article (33) of the Implementing Regulations, the Saudi Data & AI Authority (SDAIA) has issued this Guideline to assist entities in preparing records of personal data processing activities.

This Guideline also provides a sample template for the records of personal data processing activities, designed to assist Controllers in complying with the Law’s provisions and Implementing Regulations when preparing their records of personal data processing activities. The terms and phrases used in this Guideline shall be construed in accordance with the definitions provided in the Law and its Implementing Regulations. This Guideline shall not be considered a binding legal document, nor shall it substitute consulting the Law and its Implementing Regulations, which shall constitute the regulatory reference for all matters related to the application of the Law’s provisions.

Objectives

This Guideline aims to:

- 1- Assist entities in implementing the provisions of the Law.
- 2- Encourage entities to adopt best practices for personal data protection.
- 3- Outline the essential elements to be considered when preparing records of personal data processing activities.
- 4- Protect the privacy of Data Subjects.

First: Personal Data Processing Activities Records Requirements

Pursuant to Article (31) of the Law, a Controller shall maintain records of personal data processing activities in accordance with the nature of its activities to be made available upon request by the competent authority without prejudice to the provisions of Article (18) of the Law regarding data destruction.

Furthermore, as stipulated in Article (33) of the Regulations, when preparing records of personal data processing activities, a Controller shall:

- 1- Maintain the records of personal data processing activities for a period of five years following the cessation of each processing activity.
- 2- Ensure that the records of personal data processing activities are maintained in written form.
- 3- Ensure the accuracy and up to date of the records of personal data processing activities.
- 4- Make the records of personal data processing activities available to the competent authority upon request.

Second: Contents of Personal Data Processing Activities

Records

Records of personal data processing activities shall, as a minimum, include the following:

- 1- Controller's name and relevant contact details.
- 2- Information of the Data Protection Officer (DPO), wherever the appointment of a DPO is required.
- 3- Purposes of personal data processing.

- 4- Description of the personal data categories being processed, and data subjects categories.
- 5- Retention period for personal data and, where possible, specific retention periods for each category of personal data.
- 6- Categories of recipient entities to whom the personal data has been or will be disclosed.
- 7- Description of operations of personal data transfer outside the Kingdom, including the legal basis for the transfer and the recipient entities.
- 8- Description of the procedures and organizational, administrative, and technical measures in place that ensure the security of personal data, where possible.

Third: Content Details of Personal Data Processing Activities Records

The provided template for records of personal data processing activities assists entities in creating comprehensive and exhaustive records of their processing activities. This template facilitates detailed documentation of various information types and establishes meaningful connections between them. The template is structured as follows:

	Mandatory
	Optional
	Mandatory in cases requiring an impact assessment process

Field	Description
Controller Name	Specify the Controller name and relevant contact details.
Personal Data Protection Officer Details	Fill in the details related to the personal data protection officer, in the cases requiring its appointment.
Processing Activity	Detailed identification of all personal data processing activities aligned with the Controller's operations and activities. This includes categorizing datasets containing personal data and classifying internal activities that directly handle personal data.
Activity Description	A comprehensive description of each personal data processing activity that provides sufficient detail to understand the impact and associated risks of the activity.
Activity Start Date	Commencement date of the personal data processing activity.
Activity End Date	Date of data destruction and deletion of personal data processing activities records, as the case may be.
Business Unit	Name of the business unit responsible for processing activities.
Processing Purpose	Clearly and precisely identifying the purpose for processing personal data. For example: Marketing or recruitment.
Legal Basis	The legal basis to justify the specified purpose of processing personal data.
Personal Data Subject Categories	Description of the personal data subject categories whose data is being processed. Examples: Employees, clients, members.
Processed Personal Data Categories	Description of the personal data categories being processed. Examples: Contact details, location, health data, credit data.
Personal Dataset Names	Specifying names for the personal datasets.
Personal Datasets Owner	Specifying the individual(s) who own the personal datasets.
Personal Datasets Tool / Location	The tool(s) containing the personal datasets being processed or their storage locations.
Personal Data Categories Retention Periods	The planned retention period for personal data and, where possible, specific retention periods for each category of personal data.

The Entities to which Personal Data Was or Will Be Disclosed.	Any entity to which personal data has been or will be disclosed, including documentation of the date of disclosure, method of disclosure, and purpose of disclosure.
Categories of Entities to which Personal Data is Being Disclosed	Describing the entities to which personal data is being disclosed. For example: Vendors, governmental entities.
Personal Data Processor	Specifying the entities or individuals responsible for processing personal data.
Obligations between the Controller and Processor	Specifying the agreed-upon obligations between the Controller and Processor.
Personal Data Transfer	Describing whether the personal data has been or will be transferred or disclosed to an entity outside the Kingdom, and Describing data transfer activities outside the Kingdom, including the legal basis for the transfer and the recipient entities and countries to which the personal data is being transferred or disclosed.
Organizational, Administrative, and Technical Measures	Describing, where possible, the organizational, administrative, and technical measures implemented to ensure the security of personal data. For example: Encryption, access controls, training, and awareness raising.
Obtaining Data Subject Consent	Describing the procedures in place to obtain data subjects' consent for the processing activity and its purpose.
Data Subject Rights	The procedures in place to empower data subjects to exercise their rights as stipulated in the Law.
Record Update	Regular reviews of the records of personal data processing activities should be conducted to ensure the accuracy and currency of records. Record keeping is an ongoing process, and the documented information should reflect the current state of personal data processing activities. Records can be updated when: - Planning or commencing new activities involving personal data processing.

	<ul style="list-style-type: none"> - Considering new purposes that require the processing of existing personal data. - Modifying any information related to existing processing activities. - Changing the legal basis or purpose of processing. - Altering the categories of data subjects or personal data.
Entity Responsible for Latest Update	Entity responsible for latest update.
Sensitive Data	Personal data revealing racial or ethnic origin, or religious, intellectual or political belief, as well as data relating to security or criminal convictions and offenses, biometric or genetic data for the purpose of identifying the person, health data, and data that indicates that one or both of the individual's parents are unknown.
Linking of Files Aggregated from Different Sources	Linking or combining two or more personal datasets obtained from different Controllers or aggregated or processed from the outset for different purposes or all of the above.
Personal Data Processing of lacks full or partial legal capacity	For example: Underage children, and those who lacks full or partial legal capacity
Number of Personal Data Subjects Whose Data is Being Processed	Specifying the number of data subjects involved in the processing activity.
Large-scale Personal Data Processing	Describing the personal data processing activity involving a large number of data subjects, the volume and type of personal data, the geographical scope of processing, and the different groups of personal data subject categories.
Processing Frequency	Specifying the number of times processing occurs and whether it is done continuously, periodically, or at specific time intervals.
Data Processing Using Novel Technologies	Describing the processing involving the use and implementation of novel technological or organizational solutions that have not been fully tested or recognized, or that could lead to risks that harm the rights and interests of data subjects.
Automated Processing of Personal Data	Describing any form of automated processing of personal data on which decisions-making processes are based.

Personal Data Processing within a Product or Service	Describing the processing of data embedded in a provided product or service, which is likely to cause significant harm to the privacy of data subjects.
Personal Data Processing within Any Product or Service Provided to the Public	Description of the personal data processing within any product or service offered to the public, according to the nature of the Controller's activities.
Personal Data Breach Incidents Related to the Record	Procedures for reporting any breaches related to the personal data specified in this record.
Impact Assessment Procedure Description	Description of the reasons for conducting an impact assessment and whether it is mandatory or optional, as the case may be.
Impact Assessment Findings	Findings of the impact assessment after the discovery of a personal data breach and the actions taken in this regard.
Latest Impact Assessment Data	Date of last impact assessment.
Impact Assessment Reference	Impact assessment report reference.
Summary of Impact Assessment Findings	Summary of the last impact assessment report.

Fourth: Sample Template

Processed Personal Data Categories	Personal Data Subject Categories	Processing Purpose
Contact Data Credit Data	Employees	Processing Employees' Personal Data
Contact Data	Emergency Contacts	
Contact Data Credit Data	Client	Processing Personal Data for Direct Marketing



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