# ComplyKey as a Solution for
## RoPA MANAGEMENT

**Guide**

The RoPA management function is a product within the ComplyKey Control family. It is deliberately hived into a separate folder which allows controlled access and security. Logins to the system can be either granted or denied access to this folder.

RoPA Management can be used as is, or can be modified to the specific requirements of your organization. It allows the maintenance of a RoPA resulting in a fully maintained and active library of activities throughout the organization. The default management model supports central management of the records with the ability to allow other departments to add or review and maintain records that fall under their area or department. Ultimately the designated manager (s) of the library controls which records are "Live", "Review Pending" or "Retired". Other parties may submit new records or indicate that a review is complete.

| Case Ref | ROPA Type | Status | Team | Assignee | Business Function | Processing Purpose | Categories of Personal Data | Category of Individuals |
|---|---|---|---|---|---|---|---|---|
| RPA00001 | ROPA - Controller | Live | RoPA_Team | DPO | Finance | Business function | Bank details | Employees |
| RPA00003 | ROPA - Controller | Live | RoPA_Team | DPO | Finance | Legal obligation | Contact details | Employees |
| RPA00004 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Finance | Legal obligation | Financial details | Employees |
| RPA00005 | ROPA - Controller | Review Complete | RoPA_Team | RoPA_Team | Finance | Legal obligation | Expenses claims | Employees |
| RPA00006 | ROPA - Controller | Review Complete | RoPA_Team | DPO | Finance | Legal obligation | Contact details | Ex-employees |
| RPA00007 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Finance | Legal obligation | Financial details | Ex-employees |
| RPA00008 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Finance | Legal obligation | Expenses claims | Ex-employees |
| RPA00009 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Finance | Legal obligation | Travel claims | Ex-employees |
| RPA00010 | ROPA - Controller | Under Review | Finance-Group | ropafinance | Human Resources | Recruitment | Education & qualifications | Successful candidates |
| RPA00011 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Human Resources | Recruitment | Contact details | Successful candidates |
| RPA00012 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Case Management | Case Management | Contact details | Members of the public |
| RPA00013 | ROPA - Controller | Under Review | Finance-Group | ropafinance | Finance | Legal obligation | Address | Employees |
| RPA00014 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Finance | Legal obligation | - | Employees |
| RPA00015 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Human Resources | Recruitment | - | Successful candidates |
| RPA00016 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Case Management | Case Management | Contact details | Members of the public |
| RPA00017 | ROPA - Controller | Live | RoPA_Team | RoPA_Team | Case Management | Case Management | ID Card | Members of the public |

*Figure 1. Summary of Records*

## Creating RoPA records

New records can be created manually through the UI. If there is already a spreadsheet containing the catalog there may be an opportunity to transfer the records into the platform.

The first selection required is to determine if the record is for a controller or processor. There are reminders on the default dashboard and "Quick" new buttons to launch the appropriate form.

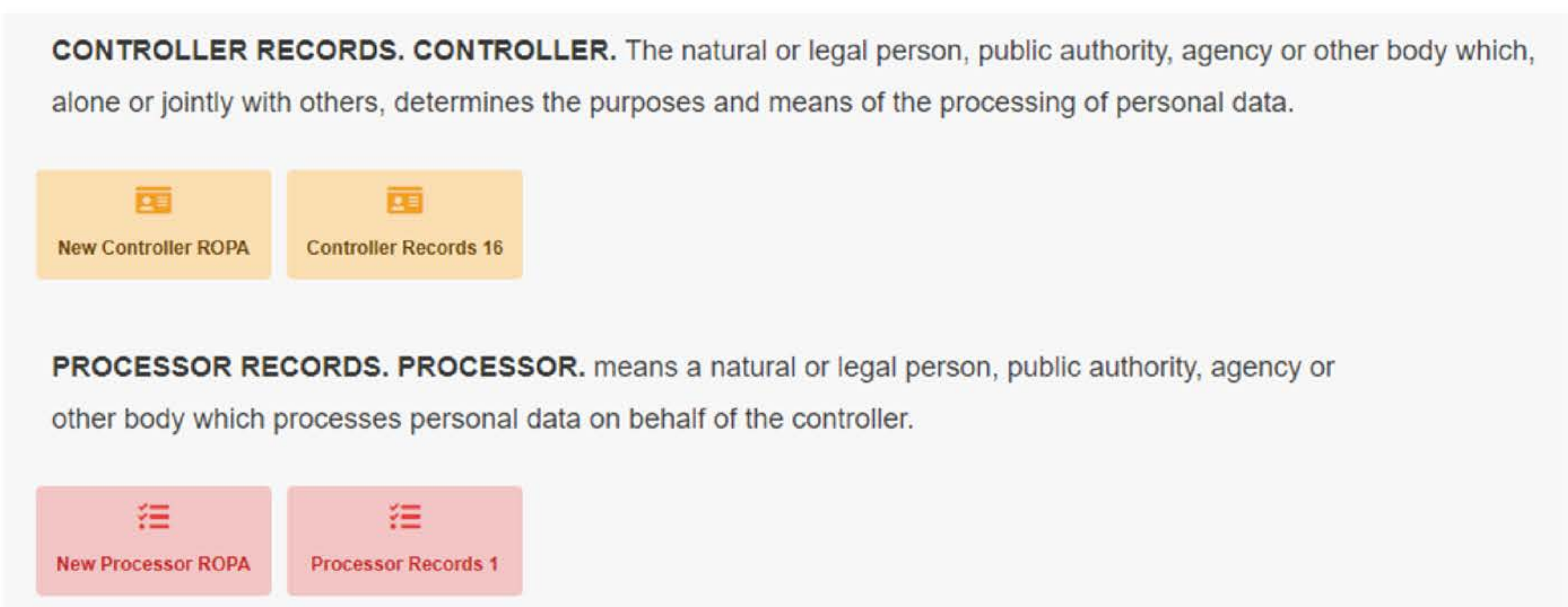


*Figure 2. Quick Launch Buttons*

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**Guide**

## Controller Record

Taking a Controller record as our example, clicking on the "New Controller ROPA" takes us to the Form.

The Form contains many fields and multiple Tabs that provide a logical grouping for the fields. They are modeled on the default ROPA spreadsheet, mandatory fields, as issued by the ICO/DPC.

These Forms can be amended to add new fields as can the selection options in the fields that offer drop-down lists. Where possible the system provides valid options to promote validity and consistency throughout the catalog.

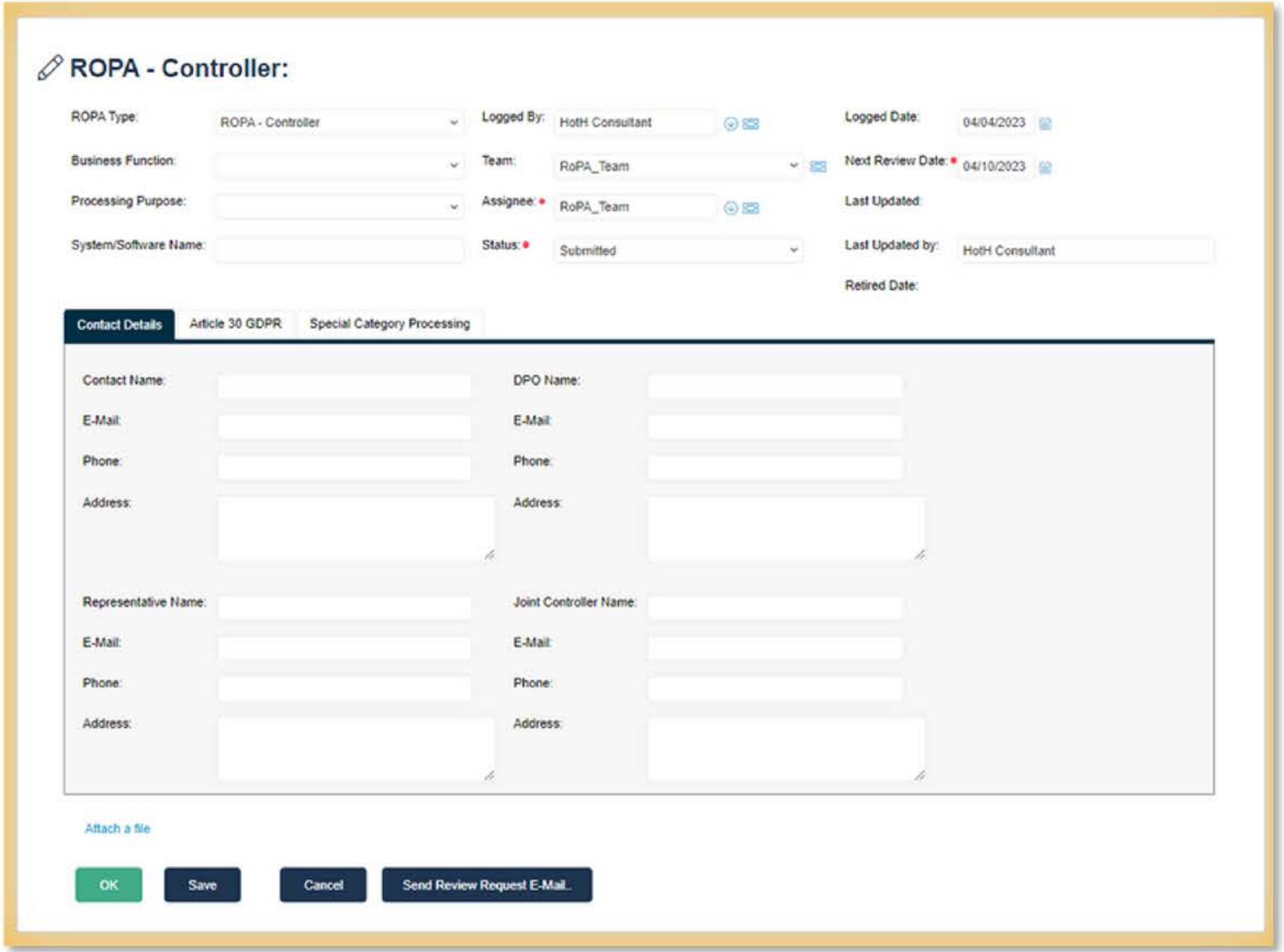


*Figure 3. Contact Details*

Changes to the forms and data options will be discussed during the consultancy sessions.

Some of the fields will show an option "* Not available. See Note". This is present by design and intended to be there so that a missing option can be proposed by adding a note to the record indicating what the option should be and why.

**Take each of the fields in turn: -**

- **RoPA Type:** This is one of two options. RoPA controller or R0PA processor. Each has a specific form. The example below is for the controller based record. A similar form and process exists for the processor records.
- **Business Function:** An overview descriptor of the related function. Used for grouping and reporting.
- **Processing Purpose:** An overview descriptor of the processing function. Used for grouping and reporting.
- **System/Software Name:** Records the software package used to collect or store the data. Used for grouping and reporting.
- **Logged by:** Automatically set.
- **Teams:** Used to Group records into teams that may maintain them. (See the section on Distributed workload.)
- **Assignee:** An individual or team managing the record.
- **Status:** All new records default to a status of "Submitted". Other options are:
  - ***Live*** *– a record that is live and represents an active processing activity. Automatically sets the next review date to 6 months.*
  - ***Retired –*** *a record representing a non-active activity but against which there may still be retained data.*
  - ***Under Review –*** *indicates that the record is being checked. Would be set to Under Review by the RoPA manager who may then assign it to an individual or team for review.*
  - ***Review Complete –*** *indicates that the record has been checked and notes added by the reviewer. The RoPA manager should assess the notes added by the reviewer and may change the status to Live or Retired.*
  - ***Submitted –*** *a newly submitted record that must be assessed by the ROPA manager who will then set the status to Live if satisfied with the record.*
- **Logged Date:** Automatically set to the date the record was added.
- **Next review Date:** Automatically set to 6 months hence once the record is set to "Live".
- **Last updated:** Automatically set if the record is amended.
- **Last updated by:** Automatically set if the record is amended.
- **Retired Date:** Automatically set when the status is changed to retired.

## Contact Details Tab

This tab contains names, e-mail addresses, phone numbers, and address details for the contact, DPO, representative, and joint controller. The function to email a review request will use the email set against the contact.

## Article 30 GDPR Tab

**Category of Individuals:** A default list is offered along with the "*Not available – See Note".

**Categories of Personal Data:** An extensive list of viable options are available, but this may not include the required value for your system. The "*Not available – See Note" option is available. Within the default list the items prefixed with an asterisk are special category data. If any of these are selected there should be entries made to the "Special Category Processing" Tab.

**Category of Recipient:** The system allows multiple selections to be made.

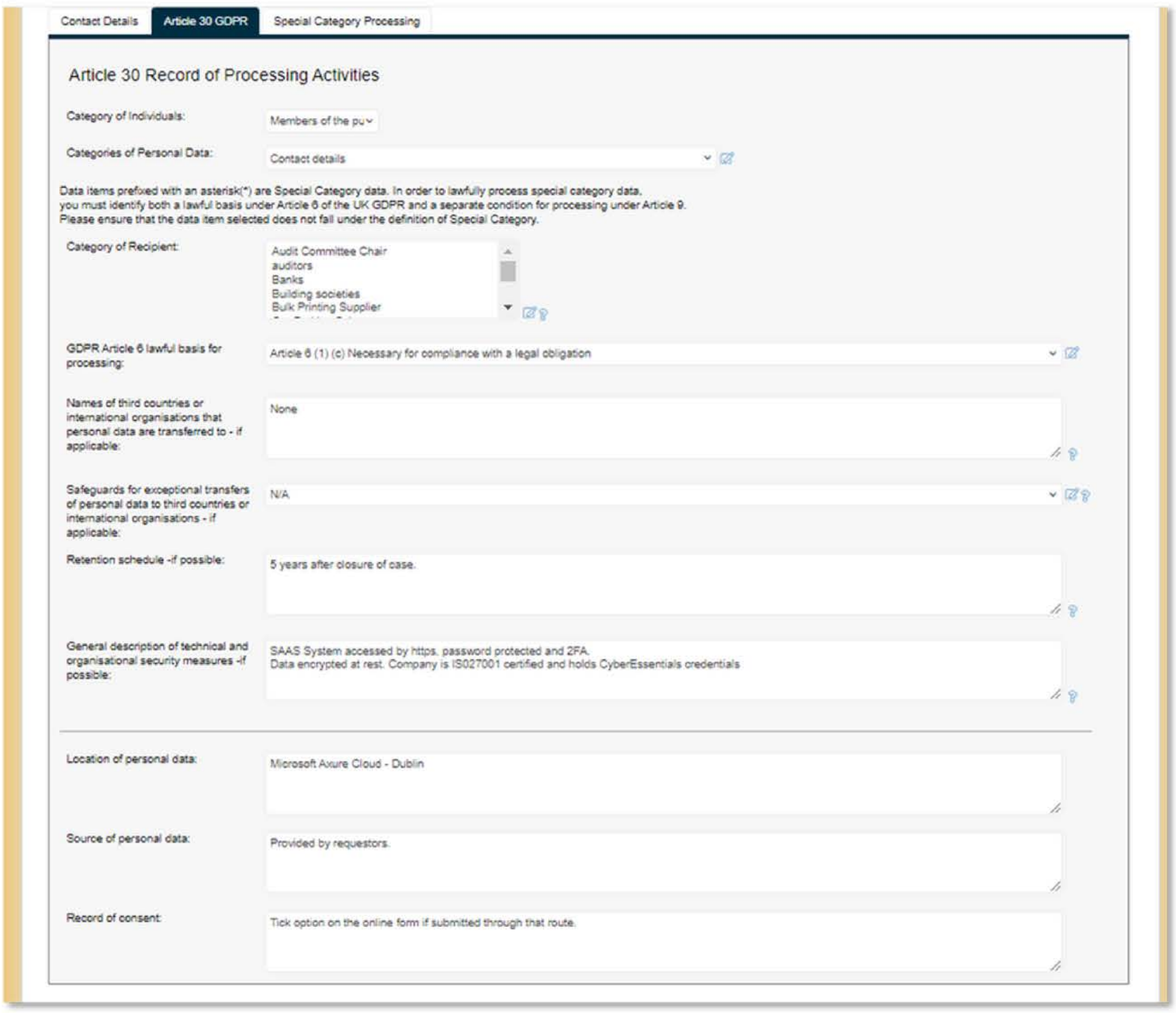


*Figure 4. Article 30 GDPR Tab*

**GDPR Article 6:** Lawful basis for processing. The system presents the 6 valid options for the lawful basis of processing.

**Names of third countries or international organizations that personal data are transferred to** - if applicable: Allows free text entry to record appropriate information.

**Safeguards for exceptional transfers of personal data to third countries or international organizations - if applicable:** A set of 9 options are available.

**Retention schedule -if possible:** Allows for the entry of information related to the retention schedule of this data item.

**General description of technical and organizational security measures -if possible:** Free text field to record measures.

**Location of personal data:** Free text

**Source of personal data:** Free text

**Record of consent:** Free text

## Special Category Processing Tab.

This tab contains information required if special category data is being processed. (See categories of personal data: on the previous Tab)

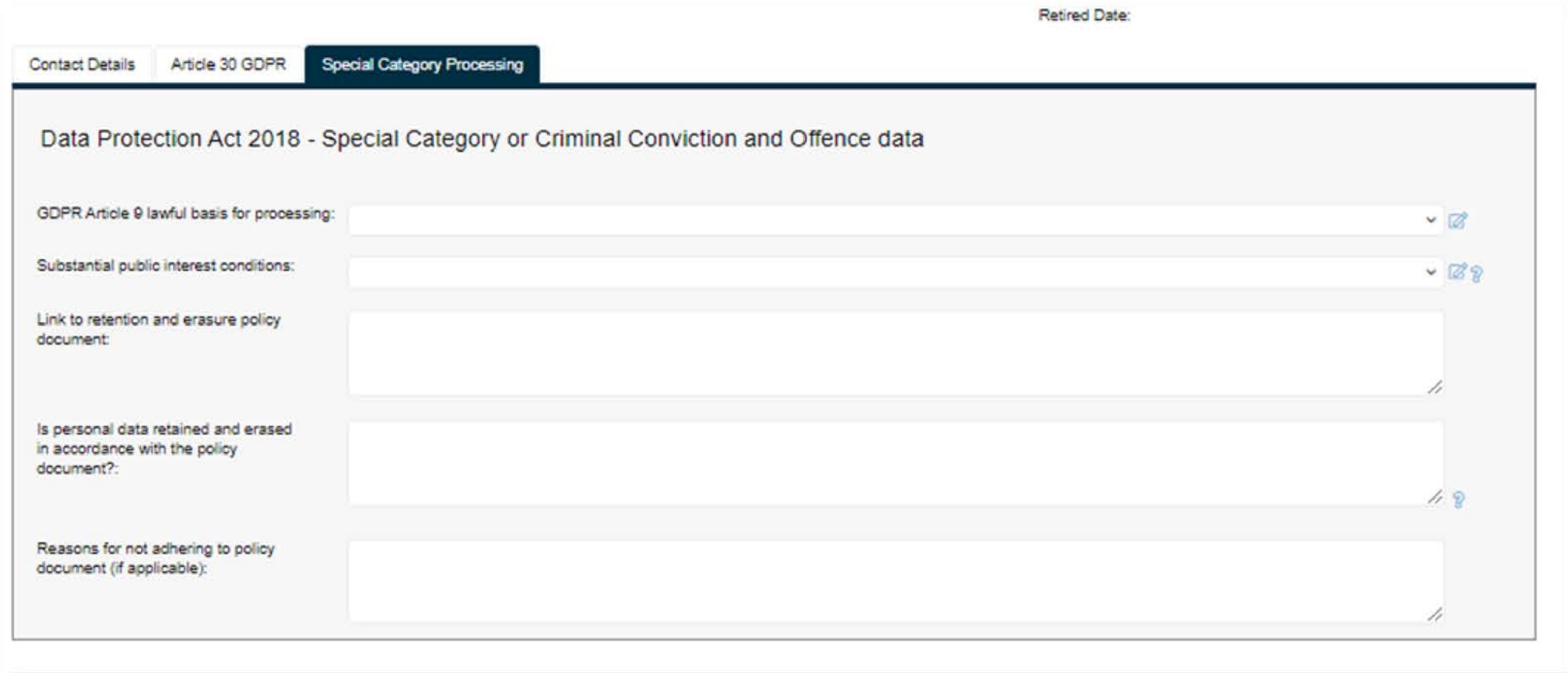


*Figure 5. Special Category Processing*

**GDPR Article 9 lawful basis for processing: The following options are offered.**

(a) Explicit consent
(b) Employment, social security, and social protection law
(c) Vital interests
(d) Not-for-profit bodies
(e) Made public by the data subject
(f) Legal claims and judicial acts
(g) Substantial public interest conditions
(h) Health or social care
(i) Public health
(j) Archiving, research, and statistics

**Substantial public interest conditions: T**he system offers multiple valid options from which the most appropriate should be selected.
The following fields allow free text to record reasons and links.

- **Link to retention and erasure policy document:**
- **Is personal data retained and erased in accordance with the policy document?**
- **Reasons for not adhering to policy document (if applicable):**

On completion of the record select OK or at any time the save option will commit the options to the database and work can continue.

## Special Category Processing Tab Cont.

Other options on the form are.

**Copy:** The RoPA record may be very granular in terms of the data selected and as such it may be the case that an area of processing will be covered by multiple records that have 90%+ of the same selections. In this case, the copy button can be used and then amendments made to the new record. This speeds up the creation of new records and promotes consistency.

**Send Review Request E-Mail:** If there is limited access to the RoPA catalog and the RoPA Manager requires the review of a single record this option allows a pre-formatted email to be sent containing all the details on the specific RoPA record. The recipient will be the email address stored under the contact e-mail on the contact details tab.
The wording on the mail can be amended but the default is shown below.

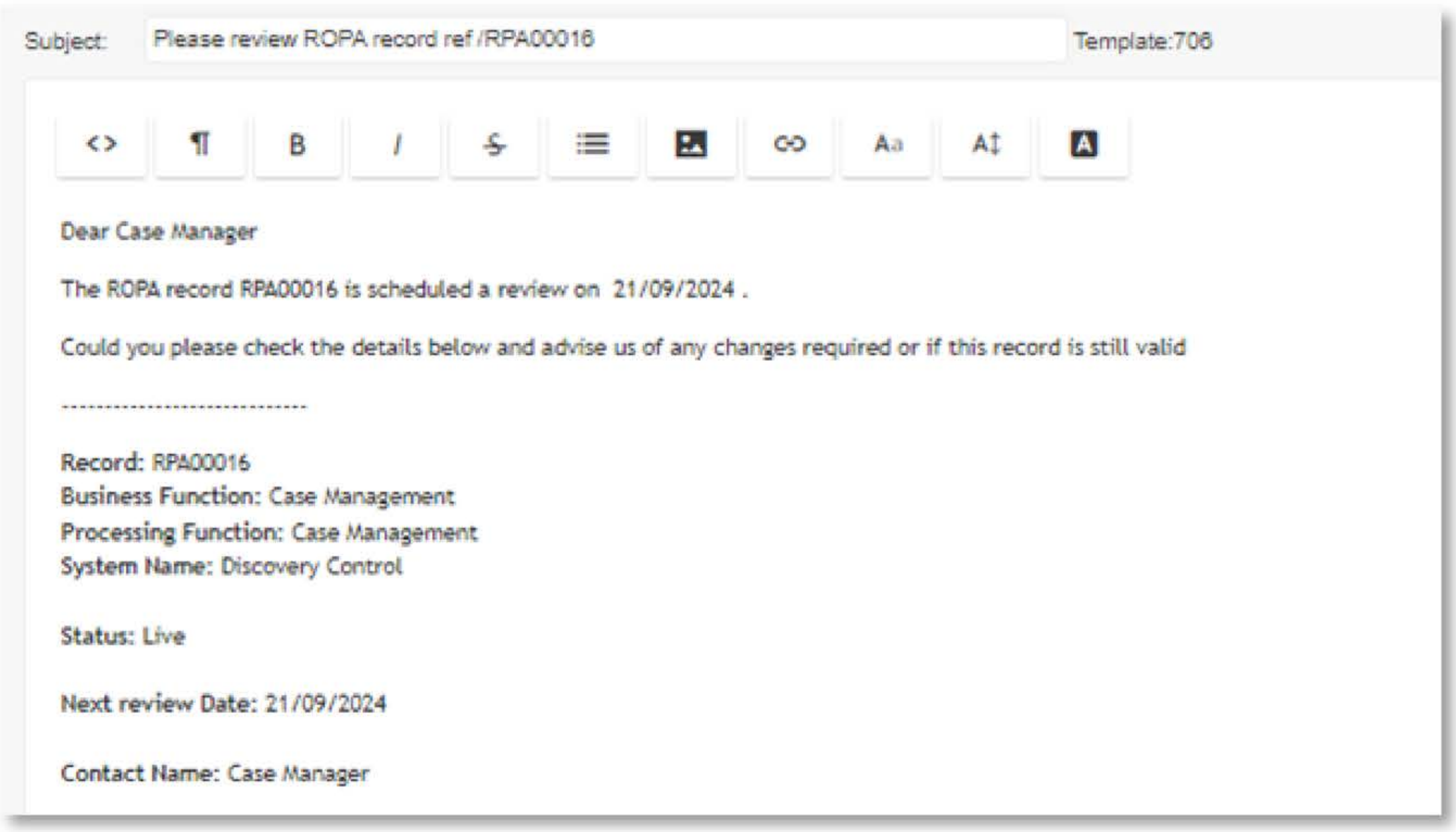


*Figure 6. Default Review Request Email*

The suggested process would be as follows: -

- The RoPA Manager picks the record based on either the next review date or another reason.
- The status is changed to "Under Review".
- The e-mail is triggered and sent.
- The contact reviews the details in the email and contact the RoPA Manager to advise of any changes or otherwise.
- The RoPA Manager adds a case note to the RoPA record and make changes as appropriate, then change the status to "Live" (or retired).

### The default RoPA Dashboard shows records under review.

ROPA Records. Under Review

| Case Ref | ROPA Type | Status | Assignee | Business Function | Processing Purpose | Next Review Date |
|---|---|---|---|---|---|---|
| RPA00010 | ROPA - Controller | Under Review | ropafinance | Human Resources | Recruitment | 23/06/2023 |
| RPA00013 | ROPA - Controller | Under Review | ropafinance | Finance | Legal obligation | 21/12/2022 |

2 ROPA Records in Total

*Figure 7. Records Under Review*

## Assigning Reviews and RoPA Creation.

The process of creating a RoPA catalog can be extremely time-consuming and often requires input and expertise from across the business. Likewise, the ongoing review of records also requires time and effort.
ComplyKey RoPA allows these tasks to be assigned to other individuals or groups within the organization.

Prior to this the appropriate teams and logins must be created within the platform which is part of the consultancy process when onboarding the system. Ongoing maintenance of these groups can be carried out by the consultant or under special provision it can be offered to the RoPA controller.

**Process:**

1. The RoPA manager will select the records that need reviewing based on date or any other factor.
2. The team and assignee are amended to the most applicable option for that RoPA record. (In the example below the record has been assigned to a finance Group.) and the status is set to "Under Review".
3. On saving the record an automatic email is sent to the new assignee (wording can be amended)

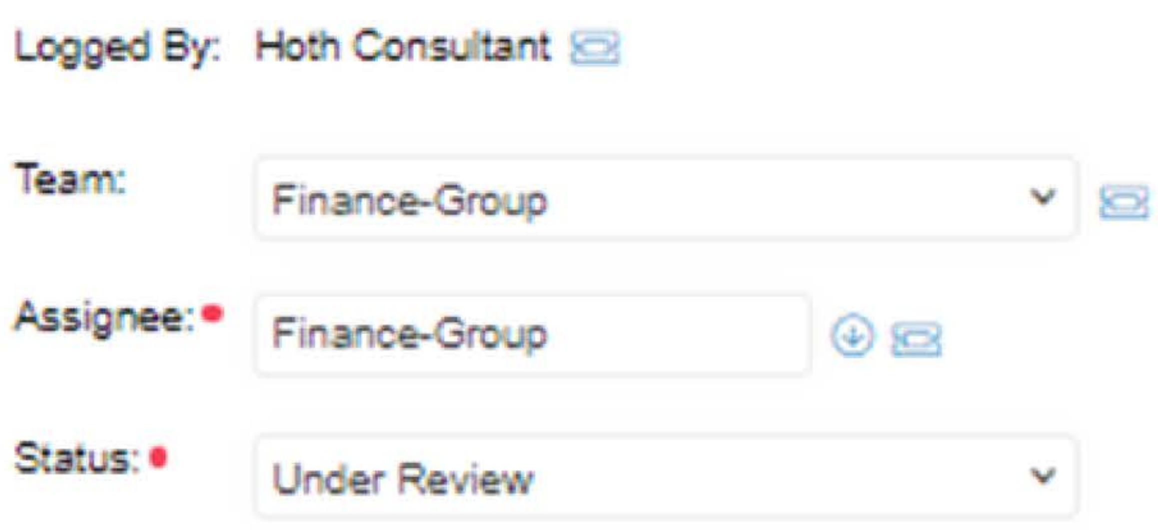


*Figure 8. Assigning Reviews*

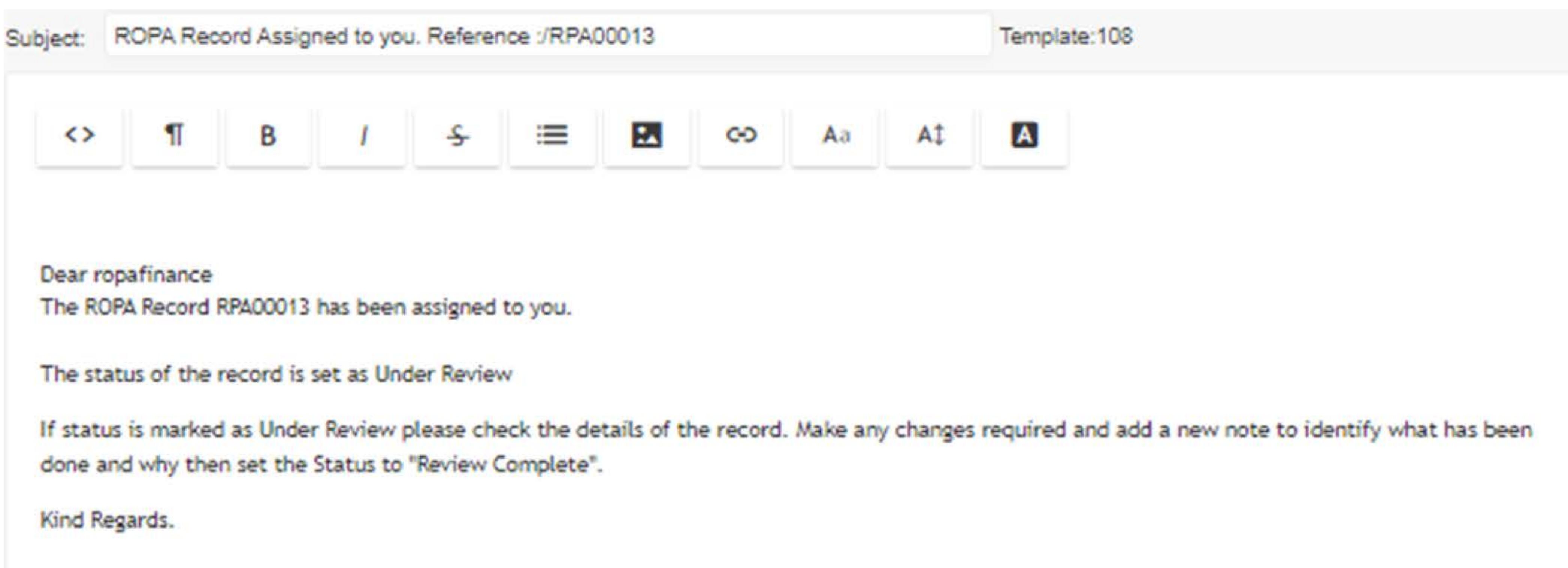


*Figure 9. Assigning Reviews Email*

5. From here they can open the records from the quick launch buttons and review each as appropriate. Amendments can be made by the agent or if the agreed process advises that they simply add a new note to record the review findings and proposed changes this can be discussed during consultancy.

Once complete the status should be changed to "Review Complete" which automatically resets the assignee back to the RoPA manager and triggers an email.

## Assigning Reviews and ROPA Creation Cont.

6. The RoPA Manager is informed of the completed review by the e-mail and records marked as review complete are shown on a dashboard report.

ROPA Records. Review Complete

| Case Ref | ROPA Type | Status | Business Function | Processing Purpose | Next Review Date |
|---|---|---|---|---|---|
| RPA00005 | ROPA - Controller | Review Complete | Finance | Legal obligation | 23/06/2023 |
| RPA00006 | ROPA - Controller | Review Complete | Finance | Legal obligation | 23/06/2023 |

2 ROPA Records in Total

*Figure 10. Review Complete Report*

7. The RoPA Manager can open each of the records, check the added notes, and make any changes required. They can also change the status of the record to either “Live” or “Retired” as per the findings of the review.

As can be seen on the reduced dashboard (Figure 8), this user also has the right to create a new RoPA Record. This process was outlined earlier in this document.
The process would be to create the record. Add notes to indicate missing data options in the drop downs and why they are needed then assign the record to the RoPA manager for review.

## Reporting

The system comes with a default set of reports and as identified through this document some of these are embedded in the default dashboards. New ad-hoc reports can be created using the report writer and all reports can be scheduled and emailed as required.