

## PROCEDURE ON RECORDS OF PERSONAL DATA PROCESSING ACTIVITIES

### SUMMARY

This [procedure](#) explains what information KAUST units must report each year so the [Personal Data Protection \("PDP"\) Team](#) can keep accurate Records of Personal Data Processing Activities ("ROPA").

Each unit is responsible to:

- Identify processes and activities your unit manages that involve personal information
- Designate individuals to complete your ROPA documents each year
- Make sure all personal data has approved retention periods
- Update the ROPA when processes or personal information involved changes
- Manage identified data privacy risks

### FREQUENTLY ASKED QUESTIONS

#### 1. Why is this procedure needed?

ROPA documentation is required by the Personal Data Protection Law (PDPL). This critical documentation helps ensure compliance with most provisions of the law. It gives visibility into the collection methods, purposes and uses, legal bases relied upon, disclosures and transfers, and destruction schedules for all personal data under KAUST's control.

#### 2. Who does this procedure apply to?

It applies to all KAUST employees and third parties processing personal data for KAUST.

#### 3. What does "processing" personal data mean?

Any activity involving personal information—such as collecting, storing, updating, transferring, analyzing, or deleting—is considered "processing."

#### 4. What are some examples of activities that require a ROPA?

Examples include recruitment, onboarding, admissions, event management, research involving identifiable human subjects, surveys, health services, travel bookings, and customer support.

## **5. What is included in a ROPA?**

A ROPA includes the purpose for collecting personal data, legal basis (e.g. consent), categories of personal data, data subjects, data sources, systems used, disclosures and recipients of personal data, transfers outside the Kingdom, retention periods, and security measures applied.

## **6. Who is responsible for providing ROPA information?**

Each unit's Responsible Executive must identify their personal data processing activities and appoint individuals to report the required information to the PDP Team.

## **7. How often must ROPA information be updated?**

Each unit must update its ROPA content annually and whenever processing details change.

## **9. What does the Personal Data Protection Team do?**

The PDP team helps units with questions on how to complete their ROPAs, reviews ROPAs for risks, updates privacy notices, and manages regulatory requests.

## **10. Why are retention periods important?**

Retention periods are required to be set by law. They ensure personal data is kept only as long as needed. Enforced retention periods can significantly reduce risks connected to a personal data breach for both individuals and KAUST.