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Annex to: Vice-chancellor's decision on the registration of personal data processing operations in accordance with the General Data Protection Regulation

## Procedures for registering personal data processing at SLU and data register management

As data controller, SLU must be able to demonstrate that personal data is processed in a way that complies with the General Data Protection Regulation (GDPR). SLU must therefore keep a register of all personal data processing operations. This register is to contain information about why the data has been processed.

### Responsibility and processing types

The data protection legal counsel maintains the register in consultation with the data protection officer.

Four types of personal data processing can be registered. The responsibility for each data processing type is divided as per the headings below.

If a person is responsible for personal data processing registration, this does not mean they must register the processing themselves. The person responsible must, however, ensure that the division, unit, or department are aware that personal data processing must be registered. Those responsible must also ensure that an annual review is conducted.

### System

*The information owner(s)* for the system are responsible for its registration. *System* refers to IT systems that store or otherwise process personal data. A system may be intended for several purposes. Upon registration, all purposes must be stated.

### **Other processing**

*Heads of division, heads of unit or head of administration at a department* must ensure that this type of processing is registered. Processing that takes place in several systems is to be registered under *Other processing*. This may include processing through lists in folders with restricted access.

### **Research projects and environmental monitoring and assessment**

The *heads of department* are responsible for registering research projects. If at any stage a research or environmental monitoring and assessment project includes personal data for research subjects, this must be registered. This applies even if the final result will not contain personal data. For example, if a project contains research participants' contact details for conducting interviews, this must be registered. However, the project does not need to be registered if it only contains information about contacts at research partners or organisations.

### **Degree projects**

A *degree project supervisor* must ensure that the work is registered if the project includes personal data at any stage. This applies even if the final result will not contain personal data. For example, if a project contains contact details for conducting interviews, this must be registered.

## **Procedures**

All new personal data processing, regardless of method, that include personal data must be registered. Do this by completing [the form](#).

There are several forms of processing that are part of larger data processing that has already been registered by the division with the primary responsibility. You can see what [processing has already been registered](#). This mainly addresses personal data processing relating to:

- human resources administration;
- financial administration;
- student administration, grades and similar;
- information relating to conferences and various meetings;
- skills provision;
- awarding scholarships;
- staff contact details;
- contact details for professional networks;
- publishing research projects and degree projects;
- research applications;
- translations;
- newsletters distributed using the system used by the Division of Communication;
- request for access to official documents.

Therefore, this processing does not need to be registered.

It is always better to register processing if you are uncertain as to whether it is necessary. If you are unable to answer anything on the form, you can write ‘under investigation’ or similar and supplement the answer later. You may also contact [dataskydd@slu.se](mailto:dataskydd@slu.se) if you have any questions.

Notify [dataskydd@slu.se](mailto:dataskydd@slu.se) as soon as possible if you have terminated any processing or a project so the register can be kept up to date.

If you have registered processing and something changes, such as additional categories of personal data are processed, or a missing data processing contract is added, the register must be updated. The update must be performed in conjunction with the changes being implemented.

## Annual review

The register must be reviewed every April. Those stated under the *Responsibility and processing types* heading are responsible for the review. The person responsible must ensure that the division, unit or department assesses the information they have registered for their processing, and see whether this is still accurate.

You can use the name of the division, unit or department to access the registrations that apply to you. If your division, unit or department has changed names in the past year, remember to search using the old name too.

Answer the following questions when you conduct your audit:

- Has any processing been terminated? Do not delete the processing. Instead, notify [dataskydd@slu.se](mailto:dataskydd@slu.se) once it has ended and why.
- Is the information still accurate about the type of personal data and data subjects being processed? If not, you can edit in the processing row so the correct details are given.
- Is any processing missing? If yes, register it as new processing.