



Enabling an Intelligent Planet

Policies and Procedures

Record of Processing Activities

Policy N°: AEU-LEG- Record of Processing Activities – 2025

Subject: Record of Processing Activities

Version: Final

Approval status: Approved

Effective Date: 2025.6.2

Publication Date: 2025.6.2

1. Scope, Purpose and Users

The purpose of this document is to provide guidance to Advantech Europe, B.V. and its subsidiaries (collectively, “The Company”) for establishing and maintaining a record of processing activities.

The users of this document are the Data Protection Officer, and the representatives of the business units responsible for processing personal data.

2. Reference Documents

- Article 30 of the EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)

3. Building a Personal Data Record

(1) The Purpose of the Inventory or Processing Activities

In order to have a common approach toward providing accountability and compliance with the provisions of the EU GDPR, and to enable the Company to have a clear view of its processing activities, the Inventory of Processing Activities will be used to record and keep track of the Company’s processing activities of personal data.

The Inventory of Processing Activities is primarily an internal document that will help employees of the Company to better understand how and why personal data needs to be processed, as well as how to develop policies and procedures to protect the data. It is an important part of the accountability responsibility of an organization. Further, in the event of an investigation by the Supervisory Authorities, it will be used to prove that the Company is aware and in control of its data operations.

The Data Protection Officer is responsible for maintaining a record of the Company's data processing activities in the form of the Inventory of Processing Activities.

The type of Inventory will depend on whether a company is acting as a Data Controller or as Data processor. If a company acts as both controller and processor (for different processing activities), then the Company must maintain the Inventory both as a controller and as a processor.

(2) Acting as a Data Controller

In order to ensure compliance with the requirements of the EU GDPR the following information must be included in the Inventory of Processing Activities:

- The name and contact details of Company's Data Protection Officer or other responsible person.
- The purposes of the processing activities.
- The categories personal data processed.
- The recipients to whom the personal data have been or will be disclosed, including recipients in third countries.
- Transfers of personal data to a third country, including the identification of the respective third country.
- The proposed time limits for erasure of the different categories of data.
- Where possible, a general description of the technical and organizational security measures.
- Department where the processing activity takes place.
- The name of the system which processes the data.
- If the company is processing the personal data together with other companies, then specify the name of this other company ("Joint controller").
- Suitable safeguards for exceptional transferring personal data.

(3) Acting as a Data Processor

When the Company acts a data processor, it must maintain an Inventory of Processing Activities of all categories of processing activities carried out on behalf of a controller, containing at least the following information:

- The name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller's or the processor's representative, and the Data Protection Officer.
- The categories of processing carried out on behalf of each controller.
- Where applicable, transfers of personal data to a third country or an international organization, including the identification of that third country or international organization.

4. Filling in and Maintaining the Inventory of Processing Activities

The responsibility of filling in the Inventory of Processing Activities rests with each of the Company's business units/departments.

Each business unit/department will maintain its own Inventory of Processing Activities. For this purpose, each business unit/department will appoint a responsible person who should fill in the initial Inventory and maintain it up to date.

The responsible person must list all the data that are processed in particular business unit/department, decide whether this data is considered to be personal data, and map all personal data to specific processing activities.

The responsible person will regularly report to the Data Protection Officer when adding/deleting new processing activities or changing the existing ones.

The Data Protection Officer will be responsible to ensure that all business units/departments shall maintain up-to-date Inventories and will act as a single point of contact for instances when the business units/departments have difficulties in identifying the correct elements to be put into the Inventories.

5. Managing Records Kept on the Basis of this Document

Record name	Storage location	Person responsible for storage	Controls for record protection	Retention time
Inventory of Processing Activities	Company intranet	Data Protection Officer	Only authorized persons may access the file with precisely defined editing rights; the change history must be maintained.	Permanent

6. Validity and document management

This document is valid as of 2025.6.2.

The owner of this document is Data Protection Officer, who must check and, if necessary, update the document at least once a year.



RTA van Velzen

CM&D Director Europe

02/06/2025