

ROPA Register — Full Workbook

Processing activities · Cross-border annex

2 modules · Expand matching sections on [DPOCertification.Org/resources](#)

Core processing activities

Activity ID	Purpose	Lawful basis	Data categories	Retention	Recipients
PA-001	Customer KYC	Legal obligation	Identity, address, PAN	7 years	Core banking, C-KYC
PA-002	Marketing personalisation	Consent	Behavioural, device ID	12 months	CDP, ad network
PA-003	HR payroll	Employment contract	Salary, bank, tax	3y post-exit	Payroll SaaS
PA-004	Customer support	Legitimate use / contract	Contact, ticket history	24 months	CRM, BPO
PA-005	Fraud detection	Legitimate use	Transaction, device fingerprint	18 months	Risk engine

Cross-border & processor annex

Activity	Destination	Safeguard	TIA date	DPA ref
PA-002	US (CDP)	SCC + supplementary measures	2025-11-02	DPA-2024-088
PA-003	Singapore (payroll)	Adequacy assessment	2026-01-15	DPA-2025-012