

COMPLIANCE WORKING RECORD

ROPA validation report

example-rhein-services-eu-ropa.csv · European Union · controller record · generated 7 August 2026 · fictional sample

Document control

Field	Value
Document type	ROPA validation report
Document reference	example-rhein-services-eu-ropa.csv
Jurisdiction	European Union
Version	1.0
Status	Working validation record
Classification	Fictional sample - not for operational use
Prepared on	7 August 2026
Rule pack	2026.07.31
Sources reviewed	31 July 2026
Generated	7 August 2026

Run record

Item	Result
Input SHA-256	6440fdb17cae183910077833663896ab4a8b988ada157753479cd61097f6df0e
Worksheet	Sheet1
Heading row	1
Data rows	3
Role	controller

Article 30(5) context

A recorded trigger makes the derogation unavailable

Even below 250 employees, the derogation does not apply where any current Article 30(5) trigger is present.

Validation summary

Status	Count
Found	23
Missing	1
Uncertain	1
Conflicting	0
Possible duplicate	2
Inconsistent	1

Findings

Status	Row	Field	Detail
Inconsistent	Data set	Retention or erasure period	Rows 3, 4 share an Activity ID but contain different values for this field.
Missing	4	Transfer destinations	A transfer is recorded, but no destination is present.
Uncertain	4	Transfer safeguards	A transfer is recorded. Confirm whether a safeguard or Article 49 documentation must be stated.
Possible duplicate	3	Record	This row has the same deterministic record key as row 4. Review before merging.
Possible duplicate	4	Record	This row has the same deterministic record key as row 3. Review before merging.

Header mapping

Field	Classification	Source column
Activity ID	supporting	A: Activity ID
Processing activity	supporting	B: Processing activity
Organisation name	core	C: Organisation name
Organisation contact details	core	D: Organisation contact
Joint controller details	conditional	Not mapped
Representative details	conditional	Not mapped
DPO contact details	conditional	E: DPO contact
Purposes of processing	core	F: Purposes of processing
Categories of people	core	G: Categories of people
Categories of personal data	core	H: Personal data categories
Categories of recipients	core	I: Recipient categories
International transfers	core	J: International transfers
Transfer destinations	conditional	K: Transfer destinations
Transfer safeguards	conditional	L: Transfer safeguards
Retention or erasure period	core	M: Retention period
Security measures	core	N: Security measures
Lawful basis	supporting	O: Lawful basis
Special-category or criminal data	supporting	P: Special category data
Special-category condition	supporting	Q: Special category condition
Source of personal data	supporting	Not mapped
Record owner	supporting	R: Record owner
Last reviewed	supporting	S: Last reviewed

Assumptions

- Role selected by user: controller.
- 68 employees recorded.
- Risk trigger: yes.
- Non-occasional processing trigger: yes.
- Special-category or criminal-data trigger: no.
- Heading row selected by user: 1.

Limitations

- Only the first worksheet is read. Formulas, comments, styles, macros and hidden-sheet logic are not interpreted.
- The corrected workbook preserves a displayed-value source snapshot and records the input SHA-256; it never overwrites the uploaded file.
- A present value is not a finding that the content is accurate, sufficient, lawful or up to date.
- Conditional duties, exemptions and transfer safeguards require human review.
- The current Article 30(5) sub-250 framework is used. Proposed changes are not treated as law.

Official sources

Source	Provision	Date	Link
EUR-Lex: Regulation (EU) 2016/679: Article 30	Article 30	31 July 2026	https://eur-lex.europa.eu/eli/reg/2016/679/art_30/oj
European Data Protection Board: Be compliant: obligation to keep records of data processing	SME data protection guide	31 July 2026	https://www.edpb.europa.eu/sme/be-compliant/be-compliant_en