

# **ROADMAP FOR DATA CONTROLLER & DATA PROCESSOR**

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**MARCH 2025**

## COMPLIANCE ROADMAP FOR DATA CONTROLLERS & DATA PROCESSORS

### 1. Governance & Accountability

- ✓ **Appoint Roles:**
  - Data Protection Officer (DPO).
- ✓ **Define Roles:**
  - **Controller:** decides purpose & means of processing.
  - **Processor:** processes data only on controller's instructions.
- ✓ **Data Processing Agreements (DPAs):** Sign clear contracts between controller & processor.

### 2. Data Inventory & Mapping

- ✓ **Maintain Records of Processing Activities (RoPA).**
- ✓ Map data flows: collection, storage, transfer, retention, and deletion.
- ✓ Classify data: personal, sensitive, or special categories.

### 3. Legal Basis & Policies

- ✓ **Controllers:** Identify lawful bases (consent, contract, legal obligation, vital interests, legitimate interest).
- ✓ **Processors:** Ensure processing only under controller's documented instructions.
- ✓ **Update Policies:** Privacy policy, data processing policy and Data controller Policy.

### 4. Data Subject Rights

- ✓ Establish processes for:
  - Access, rectification, deletion (Right to be Forgotten).
  - Data portability.
  - Restriction and objection to processing.
- ✓ timelines is 30 days.
- ✓ Automate request handling where possible.

### 5. Security & Technical Safeguards

- ✓ **Risk Assessment:** Data Protection Impact Assessment (DPIA) for high-risk processing.
- ✓ Implement:
  - Encryption & pseudonymization.
  - Access controls & multi-factor authentication.
  - Regular vulnerability assessments & penetration testing.
- ✓ Maintain audit logs for accountability.

## 6. Third-Party & Vendor Management

- ✓ Conduct due diligence on subprocessors.
- ✓ Maintain an up-to-date list of subprocessors.
- ✓ Flow down obligations via contracts (DPAs).
- ✓ Perform regular compliance audits.

## 7. Training & Awareness

- ✓ Regular staff training on data privacy, phishing, and security practices.
- ✓ Role-based training (e.g., IT security vs. HR handling employee data).
- ✓ Awareness campaigns for new regulatory updates.

## 8. Breach Management & Incident Response

- ✓ Establish a **Data Breach Response Plan**.
- ✓ Controllers: Notify authorities within 72 hours (GDPR).
- ✓ Processors: Notify controllers immediately of any breach.
- ✓ Maintain incident register & post-mortem analysis.

## 9. Cross-Border Data Transfers

- ✓ Ensure appropriate safeguards:
  - Standard Contractual Clauses (SCCs).
  - Binding Corporate Rules (BCRs).
  - Adequacy decisions.
- ✓ Conduct Transfer Impact Assessments (TIA).

## 10. Monitoring, Auditing & Continuous Improvement

- ✓ Conduct annual compliance audits.
- ✓ Monitor regulatory changes (GDPR, CCPA, LGPD, etc.).
- ✓ Maintain KPIs:
  - % of DSARs resolved within SLA.
  - Number of incidents & response time.
- ✓ Continuous improvement cycle (Plan → Implement → Monitor → Review).



**N.B:** By following this roadmap, both **Data Controllers** and **Data Processors** establish compliance, mitigate risks, and build trust with clients, regulators, and data subjects.

**SIGNED BY ITEC LTD**

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**Effective Date:** April 30,2025

**Review Date:** April 30,2025