

REPUBLIC OF RWANDA



NATIONAL CYBER SECURITY AUTHORITY DATA PROTECTION AND PRIVACY OFFICE

COMPLIANCE SELF-ASSESSMENT FORM

The purpose of checklist is to obtain a compliance image of personal data processing operations within your organization in accordance with Law N° 058/2021 of 13/10/2021 relating to the protection of personal data and privacy (DPP Law).

STEP1 - Information about your organisation

Name of organisation		
Nature of entity (<i>Tick as appropriate</i>)		
<input type="checkbox"/> Public		
<input type="checkbox"/> Private		
<input type="checkbox"/> Faith Based organisation		
<input type="checkbox"/> NGO		
<input type="checkbox"/> Political organisation		
<input type="checkbox"/> Development Partner		
<input type="checkbox"/> Others: (specify)		
Address of organisation	Country:	Province:
	District:	Sector:
	Cell:	Phone Number:
	Email:	Website (if any):
Designated Data Protection Officer	Name:	
	Phone number:	
	Email:	

STEP 2 -Operational details

Assessment question	YES	NO	N/A	Remarks / Additional explanation
1. Is your organisation registered and/or licensed to operate in Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify name(s) of regulator(s), license type(s), and license number(s).</i>
2. Is your organisation registered with the Data Protection and Privacy Office?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify registration type(s) and registration number(s).</i>
3. Have you designated a Data Protection Officer responsible for data protection and privacy compliance within your organization?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Have you conducted a Data Inventory ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please check https://dpo.gov.rw/assets/documents/guidance-on-personal-data-inventory-and-readiness-assessment-checklist.pdf for further guidance</i>

STEP 3- Principles of processing personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
5. Transparency - Are data subjects fully informed of how your organization uses their personal data in a concise, transparent and easily accessible form using clear and plain language?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Purpose limitation - Is personal data only used for the purposes for which it was originally collected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Data minimization - Is personal data collected limited to what is necessary for the purposes for which it is processed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Accuracy - Are there procedures in place to ensure personal data is kept up to date and accurate and where a correction is required and are the necessary changes made without delay?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Storage limitation - Are there retention policies and procedures in place to ensure personal data is held for no longer than is necessary for the purposes for which it was collected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 4- Rights of Data Subjects

Assessment question	YES	NO	N/A	Remarks / Additional explanation
10. Are there procedures in place for data subjects to exercise their rights?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Are there procedures in place for handling complaint and rights of data subjects to their personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 5- Collection of personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
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12. Are personal data collected in paper format?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. Are personal data collected digitally?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Are personal data collected directly from data subjects themselves?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. Are personal data collected indirectly from other Data Controllers or/and third parties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify name(s) of Data Controllers or/and third parties</i>
16. Do you provide the information described in article 42 of DPP Law to data subjects when personal data is collected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 6 - Storage of personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
17. Does your organization store personal data outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify the name(s) of hosting service provider(s).</i>
18. Is your organization authorised to store personal data outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify authorisation number(s).</i>
19. Does your organization have hosting agreements with your hosting service provider(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 7 - Share, Transfer, Access to personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
20. Does your organization share and/or transfer personal data to organisations/ individuals based outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21. Does your organization provide remote access to personal data to organisations/individuals based outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22. Do you have contract for transfer with recipient(s) outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23. Is your organization authorised to transfer personal data outside Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24. Do you share personal data with other Data Controllers in Rwanda?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25. Do you have Data Sharing Agreements in place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26. Do you involve Data Processor(s) in processing of personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27. Do you have Data Processing Agreements in place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 8- Grounds for processing of personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
28. Do you rely on consent of data subjects for processing of personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29. Have you reviewed your organisation's mechanisms for collecting consent to ensure that it is freely given, specific, informed and that it is a clear indication that the data subject has chosen to agree to the processing of their personal data by way of statement or a clear affirmative action?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30. Are there procedures in place to demonstrate that the data subject has consented to their data being				

processed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31. Where services are provided to a child, are procedures in place to verify age and get consent of a parent/ legal guardian required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32. Where services are provided to people with disability, are there procedures in place to verify and get consent of a parent/ legal guardian required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33. Are there procedures in place to allow the data subject to withdraw their consent to the processing of their personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34. Are there other legal grounds other than consent that you base on while collecting/processing personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please list other legal ground(s) you base on while processing personal data</i>

STEP 9- Personal Data Breach

Assessment question	YES	NO	N/A	Remarks / Additional explanation
35. Does your organisation have a documented personal data breach response plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36. Are there procedures in place to notify and report data subjects of a personal data breach?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37. Are there procedures in place to communicate data subjects of a personal data breach?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38. Are there procedures in place to document all personal data breaches?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

STEP 10 - Safeguards/ Data Security of Personal data

Assessment question	YES	NO	N/A	Remarks / Additional explanation
39. Have you assessed the risks involved in processing personal data and put measures in place to mitigate against them?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please list risks identified and measures in place to mitigate against them</i>
40. Is there a document that specifies the technical and organisational measures for personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
41. Do security controls or procedures include measures to ensure pseudonymisation and encryption employed for transferring, storing, and receiving personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
42. Is personal data systematically destroyed, erased, or anonymised when it is no longer legally required to be retained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
43. Do you have an audit log of activities performed on these personal data repositories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
44. Do you maintain records of processed personal data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
45. Is access to personal data controlled and based on role?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
46. Do you carry out DPIA for high risks processing operations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>please specify high risks processing operations</i>