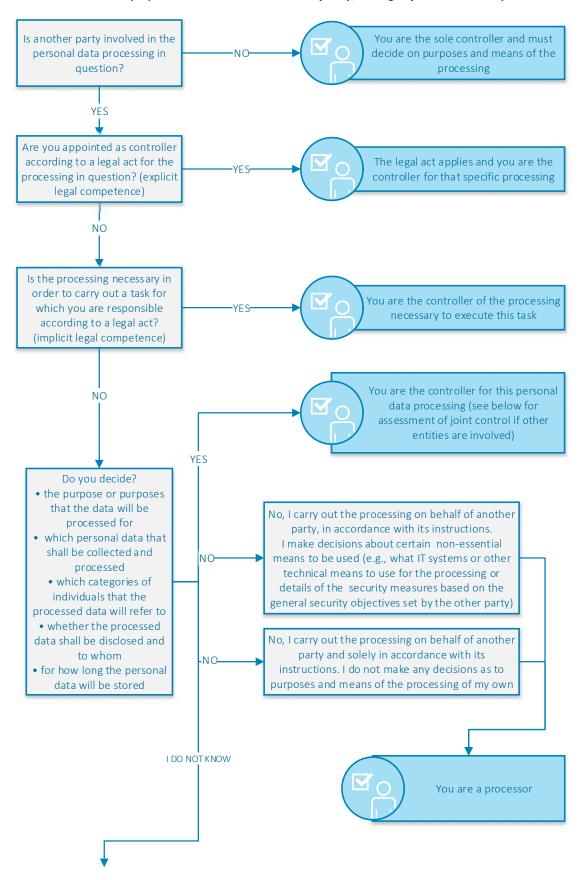
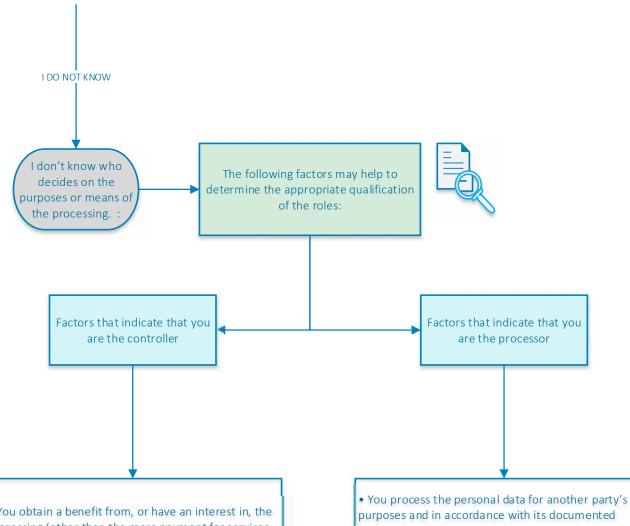
## Annex I – Flowchart for applying the concepts of controller, processor and joint controllers in practice

Note: in order to properly assess the role of each entity involved, one must first identify the specific personal data processing at stake and its exact purpose. If multiple entities are involved, it is necessary to assess whether the purposes and means are determined jointly, leading to joint controllership.





- You obtain a benefit from, or have an interest in, the processing (other than the mere payment for services received from another controller)
- You make decisions about the individuals concerned as part of or as a result of the processing (e.g. the data subjects are your employees)
- The processing activities can be considered as naturally attached to the role or activities of your entity (e.g. due to traditional roles or professional expertise) which entails responsibilities from a data protection point of view
- The processing refers to your relation with the data subjects as employees, customers, members etc.
- You have complete autonomy in deciding how the personal data is processed
- You have entrusted the processing of personal data to an external organisation to process the personal data on your behalf

- You process the personal data for another party's instructions - you do not have a purpose of your own for the processing.
- Another party monitors your processing activities in order to ensure that you comply with instructions and terms of contract.
- You do not pursue your own purpose in the processing other than your own business interest to provide services.
- You have been engaged for carrying out specific processing activities by someone who in turn has been engaged to process data on another party's behalf and on this party's documented instructions (you are a subprocessor)

## Joint controllership - If you are the controller and other parties are involved in the personal data processing:

