

GDPR checklist for document processing

Eleven checkpoints for companies that process documents containing personal data – each with the PaperOffice AI functions that help.

COMPANY	AREA / FLOW	REVIEWED BY	DATE
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☐ Tick what is defined and documented in your company ☐ PaperOffice AI functions as described on paperoffice.ai

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 01

Legal basis and purpose

Art. 5(1)(b), Art. 6, Art. 30 GDPR

For every document type containing personal data, purpose and legal basis are defined and documented in the record of processing activities. Documents are used only for that purpose.

HOW PAPEROFFICE AI HELPS

Workspaces per client, department or project, each with its own permissions; classification assigns the document type on arrival.

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 02

Retention and deletion periods

Art. 5(1)(e) GDPR

For each document type it is defined how long it must be kept (for example under commercial and tax law) and when it has to be deleted. The periods are documented and known to the team.

HOW PAPEROFFICE AI HELPS

Retention period per document type from arrival, optionally with WORM protection until the period ends.

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 03

Deletion concept

Art. 17 GDPR

It is defined who deletes what, when and how, how exceptions due to retention obligations are handled and how deletions are proven – including legacy archives, mailboxes and network drives.

HOW PAPEROFFICE AI HELPS

Due deletions as a task, the deletion itself in the audit trail; under WORM protection no deletion before the period ends.

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 04

Access and roles

Art. 25, Art. 32 GDPR

Only people who need access for their task get it. Roles and permissions are documented and reviewed regularly; sensitive areas are additionally secured.

HOW PAPEROFFICE AI HELPS

Permissions per workspace for users and groups, with mandatory 2FA and IP whitelist in Compliance workspaces; agents, REST API and MCP work with the same permissions.

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 05

Logging

Art. 5(2) GDPR (accountability)

Access, changes, sharing and deletions are traceable. The logs are protected against changes and can be evaluated for audits.

HOW PAPEROFFICE AI HELPS

Audit center: every action with time, user and context, entries with an integrity hash, export as PDF, CSV or JSON.

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 06

Redaction of personal data

Art. 5(1)(c) GDPR (data minimization)

Before sharing, publication or file inspection, personal data that is not needed is removed – in scans, photos and attachments too.

HOW PAPEROFFICE AI HELPS

Redact Agent: detects names, addresses, IBANs and further categories, in scans too; areas are removed from the PDF, not covered.

☐ 07

Processing on your behalf (DPA)

Art. 28 GDPR

A data processing agreement is in place with every service provider that processes personal data on your behalf. Further processors used are known.

HOW PAPEROFFICE AI HELPS

DPA generator in the app (Art. 28), from your company data as a PDF. No external AI providers, no AI subprocessors, no training on your data.

☐ 08

Technical and organizational measures (TOMs)

Art. 32 GDPR

Encryption, access control, availability, recoverability and the regular review of the measures are described – on your side and at the service provider.

HOW PAPEROFFICE AI HELPS

TOM generator in the app (Art. 32); AES-256 and TLS 1.3. ISO/IEC 27001 certified (certificate under NDA); SOC 2 Type II in preparation.

☐ 09

Data location and transfers

Chapter V GDPR (Art. 44–49)

You know where documents are processed and stored and whether data is transferred to third countries. Every transfer has a legal basis.

HOW PAPEROFFICE AI HELPS

Own data center in Navarra, Spain (EU). With BYOS, files are stored encrypted on your NAS or server (SFTP); PaperOffice keeps index, metadata and AI results in its own EU data center.

☐ 10

Data subject rights

Art. 12–22 GDPR

Access, rectification, erasure and data portability can be handled on time – as a rule within one month (Art. 12(3)) – even across scattered storage.

HOW PAPEROFFICE AI HELPS

Collect every document about one person through search and export it redacted; deletions and corrections are recorded in the audit trail.

☐ 11

Data breaches

Art. 33, Art. 34 GDPR

A reporting path is defined: notification of the supervisory authority, where feasible within 72 hours, and information of data subjects in case of high risk. Scope and affected documents can be determined quickly; every breach is documented.

HOW PAPEROFFICE AI HELPS

The audit trail shows access, exports and shares; login monitoring alerts on new devices and IP addresses; deliveries from the DMS can be revoked.

OPEN ITEMS AND ACTIONS	OWNER	DUE
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Note: This checklist is not legal advice. It replaces neither the review by your data protection officer nor legal advice in the individual case.

The information on PaperOffice AI reflects paperoffice.ai as of October 2026. PaperOffice’s certificates cover the operation of PaperOffice, not your processes.