

RNB REPORTING

Assessment of legal basis for processing (LIA) and DPIA – supervisory version

Version 1.0 11. May 2026

1. Purpose and Legal Framework

This document has been prepared as documentation of the legal basis for processing in accordance with the General Data Protection Regulation (GDPR), Article 6, as well as an assessment of the need for a Data Protection Impact Assessment (DPIA) pursuant to Article 35.

The assessment has been carried out in line with guidelines from the European Data Protection Board (EDPB), including Opinion 06/2014 on legitimate interests and the DPIA guidelines.

2. Data Controller and Processing Activity

The Norwegian Offshore Directorate (Sokkeldirektoratet) is the data controller.

The processing includes the receipt, validation, quality assurance, and follow-up of RNB reporting.

Personal data are processed as an integral part of dialogue, validation, and traceability in the process.

3. Categories of Personal Data and Data Subjects

The data subjects are employees of operator companies acting in a professional capacity.

The personal data processed are limited to name, work-related email address, and role/affiliation with the reporting process.

No special categories of personal data pursuant to Article 9 are processed.

4. Purpose of the Processing

The purpose is to ensure accurate, consistent, and verifiable reporting for use in public decision-making.

The processing enables effective communication and documentation of professional assessments.

The purpose is closely linked to the exercise of official authority and public interests.

5. Legal Basis

Processing of reporting data is carried out pursuant to Article 6(1)(c) – “legal obligation.” The reporting obligation follows from Section 50a of the Petroleum Regulations, and the processing of associated personal data is therefore necessary to comply with a legal obligation under Article 6(1)(c).

Supplementary processing of personal data is carried out pursuant to Article 6(1)(f) – “legitimate interests.” The supplementary processing under Article 6(1)(f) concerns administrative and communication activities that do not in themselves constitute the exercise of official authority, but are necessary to ensure effective dialogue, quality assurance, and traceability.

6. Assessment of Legitimate Interests (Article 6(1)(f))

Purpose test: The Norwegian Offshore Directorate has a legitimate interest in ensuring data quality, traceability, and accountability in the reporting process.

Necessity test: Identification of individuals is necessary for dialogue, follow-up, and documentation. Alternatives such as anonymization are not suitable.

Balancing test: The processing takes place in a professional context, with limited data. The data subject can reasonably expect such processing.

On this basis, the legitimate interest is not considered to be overridden by the rights of the data subject.

7. Assessment under Article 5 (Fundamental Principles)

Purpose limitation: The data are used exclusively for reporting purposes.

Data minimization: Only necessary data are processed.

Storage limitation: Data are stored only as long as necessary and will be deleted within a reasonable time after the need has ceased.

Integrity and confidentiality: Measures have been established to secure the data (see Section 10).

8. DPIA Screening (Article 35)

The processing has been assessed against criteria for high risk.

No sensitive data are processed, there is no systematic monitoring, and the processing is limited in scope.

The processing does not fall within the Norwegian Data Protection Authority’s list of processing activities that always require a DPIA.

It has therefore been concluded that a full DPIA is not required.

9. Risk Assessment

Identified risks include unauthorized access and incorrect use of identity.

The risk level is assessed as low to moderate.

10. Risk Mitigation Measures

Measures include role-based access control, authentication, encryption, and logging.

Organizational measures ensure correct use and restricted access.

11. Rights of the Data Subject

The data subject has rights under the GDPR, including access, rectification, and erasure.

The data subject may exercise their rights by contacting the data controller (RNB@sodir.no).

Any limitations follow from archiving obligations and the exercise of official authority.

12. Conclusion

The processing is lawful pursuant to Articles 6(1)(c) and 6(1)(f).

The processing is necessary, proportionate, and in line with the principles set out in Article 5.

There is no requirement for a full DPIA.