

What is processing of personal data?

The DPL defines processing very broadly, covering any conceivable use of data. In fact, any activity which affects personal data in any way constitutes processing; mere storage or retention will constitute processing as well.

In relation to personal data, “processing” is:

obtaining, recording or holding data, or carrying out any operation or set of operations on personal data, including -

- (a) organizing, adapting or altering the personal data;
- (b) retrieving, consulting or using the personal data;
- (c) disclosing the personal data by transmission, dissemination or otherwise making it available; or
- (d) aligning, combining, blocking, erasing or destroying the personal data;