I'm going to receive a list of participants in a workshop in Tanzania. Use lovkart tools to list the requirements that, according to Norwegian law (GDPR), I have to take into consideration to protect their privacy.

I'll research this in Lovkart across the Personal Data Act, GDPR, preparatory works and case law. That includes the transfer rules, since Tanzania is outside the EEA.

Used 19 tools, read 2 pages, loaded tools ›

The Norwegian rules apply to you **because your organisation is established in Norway**. It doesn't matter that the participants are in Tanzania. Personopplysningsloven § 4 first paragraph says the Act and the GDPR cover processing "i forbindelse med aktivitetene ved virksomheten til en behandlingsansvarlig … i Norge, uavhengig av om behandlingen finner sted i EØS eller ikke". In English: processing connected to the activities of a controller in Norway, whether or not the processing happens inside the EEA. The preparatory works, Prop. 56 LS (2017–2018) (note to § 4), confirm that this is the establishment principle and should be read like GDPR Article 3(1). The GDPR applies in Norway as law through § 1.

What you must do with the participant list

1. Have a legal basis (art. 6)

- For a workshop list, the usual basis is (b), necessary for an agreement with the participant, or (f), legitimate interest. Consent (a) is mainly needed for extras, such as adding people to a newsletter.
- If you rely on (f), Høyesterett set out three cumulative conditions in HR-2021-2403-A, avsnitt 50: a legitimate interest, necessity, and a balancing that comes out in your favour. Under avsnitt 55, "necessary" means the purpose can't reasonably be achieved just as effectively in a less intrusive way.

2. Follow the core principles (art. 5)

- Use the list only for the workshop (purpose limitation).
- Collect only what you need, for example name, organisation and contact details (data minimisation).
- Keep it accurate.
- Delete it when it's no longer needed (storage limitation).
- Keep it secure.
- Be able to *show* that you comply (accountability).

3. Inform the participants (art. 14)

- If the list comes from someone else, such as a Tanzanian partner, Article 14 applies. You must tell participants:
  - who you are and why you process their data
  - your legal basis
  - who receives the data
  - how long you keep it
  - their rights, including the right to complain to a supervisory authority
  - where you got the data
  - any transfer outside the EEA
- When: at the latest at your first communication with them, and in any case within one month (art. 14(3)).
- If you collect the data directly from participants, Article 13 applies instead, with similar content.

4. Watch for sensitive data (art. 9)

- Information about health, religion, ethnicity or political views is prohibited unless an exception applies, usually explicit consent.
- This can come up through accessibility needs, dietary requirements that may reveal religion or health, or the participants' organisational affiliations.

5. Secure the data (art. 32)

- Use measures that fit the risk, such as encryption, access control and the ability to restore data.
- Make sure only authorised people handle the list, and only according to your instructions.

6. Sign data processing agreements (art. 28)

- Anyone processing the list on your behalf needs a written agreement covering the content listed in art. 28(3).
- Examples: a registration platform, a cloud service, or a local organiser acting on your instructions.

7. Keep a record of processing (art. 30)

- Organisations with fewer than 250 employees are exempt, but not if the processing is more than occasional, involves risk, or includes Article 9 data (art. 30(5)).

8. Handle breaches (art. 33)

- If the list is lost or leaked, notify Datatilsynet without undue delay and within 72 hours where feasible, unless the breach is unlikely to result in a risk.
- Document every breach, even those you don't report.

9. Follow the rules for sending data to Tanzania (art. 44)

- Receiving the list in Norway is not a third-country transfer. Sending personal data *to* Tanzania is, for example back to the partner, to a hotel or to a local supplier.
- As far as I know, Tanzania has no EU adequacy decision [modellkunnskap — verifiser]. That leaves two routes:
  - **Safeguards under art. 46**, typically the Commission's standard contractual clauses (art. 46(2)(c)).
  - **Derogations under art. 49** for specific situations. Examples are a transfer necessary for a contract concluded in the participant's interest, such as a hotel booking (49(1)(c)), or explicit consent after being informed of the risks (49(1)(a)). These are meant for specific situations, not routine bulk sharing.
- Any transfer must also be included in the information you give participants (art. 14(1)(f)).

Case law note

Of the ten Supreme Court decisions in Lovdata that cite the Personal Data Act, none deals with third-country transfers or event lists. HR-2021-2403-A is relevant only for the legitimate-interest test. I read that decision in full from the court's own page, which is where the decision texts are published. Tanzania may also have its own data protection rules that your local partner must follow; I haven't checked those.

I'm not a lawyer, and this is information from the retrieved sources, not legal advice. For practical questions you can contact Datatilsynets veiledningstjeneste, or a lawyer via Advokatenhjelperdeg.

Sources:

- Personopplysningsloven: § 1, § 4
- GDPR, applying as Norwegian law under § 1: art. 5, art. 6, art. 9, art. 14, art. 28, art. 30, art. 32, art. 33, art. 44, art. 46, art. 49
- Prop. 56 LS (2017–2018)
- HR-2021-2403-A

19 minutes ago

can you create a action list for me in excel?

I'll turn the requirements into an Excel action list with columns for owner, deadline and status.

Ran 2 commands, read a file, shared files

I've made an Excel action list with 21 actions, grouped into four phases: before receiving the list, when it arrives, during the workshop and after the workshop.

For each action, the sheet shows the action, the provision it comes from (linked to Lovdata) and practical notes on how to do it. You fill in the yellow columns: owner, status (a dropdown), deadline and comments. A small progress panel to the right of the title counts actions by status and shows how much is done. Row 1 has example values for the columns you fill in; replace them with your own.

A second tab lists all the sources. As before, the point that Tanzania has no EU adequacy decision is my own understanding and should be checked before you rely on it.

Ask Claude your own question