GDPR Transfer Impact Assessment Checklist

Preparing the assessment for a data transfer

This checklist structures the information needed before transferring data outside Morocco or the EU. A **no** or **not sure** signals a point to document before the transfer.

Framework	When it applies to you
Moroccan law 09-08 / CNDP	All processing carried out in Morocco: clients, prospects, staff, website.
EU GDPR	Once you process data of people located in the EU, or target the European market.

1 Describe the transfer

- [ ] The exporter and importer are identified.
- [ ] Sub-processors are known.
- [ ] The people and categories of data involved are listed.
- [ ] The purposes and frequency of the transfer are specified.
- [ ] Storage, support, administration and backups are described.

2 Identify the mechanism

- [ ] An adequacy decision covers the destination country, if one exists.
- [ ] Standard contractual clauses are signed, otherwise.
- [ ] Binding corporate rules apply, where relevant.
- [ ] An exceptional derogation is documented, if it is the only option.
- [ ] Separate local formalities (CNDP or others) are identified.

3 Third-country context

- [ ] The law governing public authority access is known.
- [ ] Actual practice is documented, not just the written law.
- [ ] Available remedies for the person concerned are identified.
- [ ] The importer has been transparent about access requests received.
- [ ] Factual, verifiable experience has been checked.

The third country's written law is not enough: actual practice by its authorities matters as much as the text.

4 Supplementary measures

- [ ] Encryption and key control are in place.
- [ ] Pseudonymization is used where possible.
- [ ] Data is minimized before the transfer.
- [ ] Logical separation of environments exists.
- [ ] A notification and challenge procedure is in place.
- [ ] Access controls on the importer's side are verified.

5 Conclusion

- [ ] The residual risk of the transfer is assessed.
- [ ] Approval conditions are written down.
- [ ] A decision-maker and date are identified.
- [ ] Actions to take before the transfer are listed.
- [ ] Review triggers are defined.
- [ ] Evidence of the assessment is kept.

Next step with RCM

RCM can carry out this transfer impact assessment for your sensitive transfers and secure the file before a review.

Book a call: calendly.com/rgpdconseilmaroc-reunion/30min
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This checklist is general guidance and does not replace an audit or legal advice for your specific situation.