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GDPR — Articles 30, 32, and 5(1)(c)

Time-accurate records of processing, by-reference pseudonymisation, and lawful-basis stamping.

What the regulator asks

Recent supervisory-authority decisions cite **Article 30** (records of processing) as a standalone violation, separate from breach. Fines under Art. 83(4) reach €10M or 2% of global turnover. The question: *what was the lawful basis, the recipient, and the retention rule for this processing on the day of the request?* — not what the dashboard says today.

Clause → Magellan primitive

Clause	What it requires	How Magellan answers it
`Art. 30(1)`	Records of processing — categories, recipients, retention, transfers — kept up to date.	ULID primary key — lexicographic order is chronological order. "What was true on day X" is a primary-key range scan.
`Art. 5(1)(c)`	Data minimisation in records of processing themselves.	Mappings reference data by ULID; payload never enters the ledger. The Art. 30 record does not become an Art. 5 problem.
`Art. 5(2)`	Accountability — controller must demonstrate compliance.	SHA-256 hash chain over Art. 30 records. The controller can prove the record was not retroactively edited after the supervisory request.
`Art. 6`	Lawful basis recorded and traceable to the processing activity.	Lawful-basis tag on every mapping, signed by the Approver. The basis at release time is what the supervisory authority sees.
`Art. 32(4)`	Persons act only under instructions of the controller.	Role-at-time-of-action stamping. Contractor or processor role is preserved retroactively; promotion does not rewrite history.
`Art. 33`	Breach notification within 72 hours — evidence ready.	Reproducible exports — the Art. 30 record needed for the notification is a query, not a project.

Why this works on inspection

- **The DPO answers a supervisory request as a query, not a project.** Time-accurate Art. 30 evidence is a property of ULID ordering.
- **Pseudonymisation by reference.** Personal data lives in the mapped store; the ledger references it by ULID. Art. 30 export ≠ Art. 5 problem.
- **Joint-controller scenarios.** Per-tenant signing keys (year-2 capability) keep evidence separable when controllers diverge.

Evidence pack the assessor receives

Art. 30 record for the queried date range, SHA-256 hash chain, role grants and processor designations in effect, lawful-basis tags on every referenced mapping, and a verification script. Format matches what a supervisory authority case officer expects under most national DPA practice.