



GDPR – A Roadmap for getting Started

Institute of Public Administration

Kate Colleary

Co-Founder and Director Frontier Privacy

25.01.2018



Implementation

- ▶ Draft Regulation published on 25 January 2012
- ▶ Final draft wording agreed on 15 December 2015
- ▶ Signed -14 April 2016
- ▶ Implementation date: 25 May 2018
- ▶ Designed to result in single, uniform set of data protection rules applying across the EU - a “One-Stop Shop”



What???

- ▶ One stop shop – easier to roll out European compliance programme
- ▶ New rights: data portability; to be forgotten; erasure;
- ▶ New rules on profiling
- ▶ Emphasis on explicit consent
- ▶ Demonstrate compliance – procedures, protocols and training
- ▶ Risk Analysis
- ▶ Privacy by Design and Default/.Transparency
- ▶ Privacy Impact Assessments
- ▶ Pseudonymisation
- ▶ Data Processors – big impact
- ▶ Fines – up to 4% annual group global turnover; €20m
- ▶ Potential litigation



Where should organisations start?

1. Gap Analysis

- ▶ Where are you on the compliance roadmap at the moment?
- ▶ Where do you need to get to? How do you get there? Seek budget and buy in.
- ▶ Identify inward issues (employee issues) and outward issues (clients/customers/third parties)

2. Project Plan / action list

3. Data Inventory process

- ▶ Data flows in – notifications to data subjects
- ▶ Data flows out – third party contract in place?
- ▶ Internal data process – access limitations; security; Intra-group agreements- Every data transfer within the group is a transfer to a third party. Consequences: for HR centralisation, group services
- ▶ Create Data Protection Impact Assessment (DPIA) template



Where should businesses start?

4. Review of third party contracts for GDPR compliance

- ▶ What third parties can access your business' personal data? IT service providers? Outsourced payroll? Outsourced Security company? Shredding/Archiving?

5. Review/amend/ draft Policies, Procedures and Protocols

- ▶ Do they contain requisite GDPR clauses?
- ▶ Adequate notification?
- ▶ Is consent required?
- ▶ Log of processing activity
- ▶ Log of data breaches etc

6. Consider whether you're required to appoint a DPO

7. Education

- ▶ Train on the policies, procedures and protocols
- ▶ Maintain education log



Where should businesses start?

RESULT: Data Protection Hub

- ▶ Soft or hard copy
- ▶ Include all template docs
- ▶ Consider linking to contracts database

Very handy way to demonstrate compliance to DPC's team on audit.



Thank You

Kate Colleary

Founder & Director



FRONTIER
privacy

4 Upper Pembroke Street, Dublin 2

Tel: +353 1 639 2935

kcolleary@frontierprivacy.com

www.frontierprivacy.com