

WORKING ON A GDPR PROJECT – OUR EXPERIENCE

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GDPR is a change management project



“What if we don't change at all ...
and something magical just happens?”

- Early communication and sponsorship at the highest level is essential
- Being able to speak with confidence about the topic will help ensure change happens - gather as much information as possible on the subject (web, seminars, industry contacts etc.)
- Since the remit of the regulation is defined the resources do not have to be gurus in terms of data protection; someone with attention to detail, able to keep track of who is doing what and with the personality to be able to insist deadlines are met is key
- It'll be frustrating! No-one likes to have to change their policies, processes and ways of doing things

A project means a defined set of tasks that isn't business as usual; this one involves ensuring that processes, systems and attitudes are changed – all take time, don't wait!

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Where to start?

- Review of ICO site is a good place to start
- We reviewed their recommendations
- We continue to identify any gaps in our current process
- We are working with key members of the business teams to decide how to prioritise the order of updating processes that need to change

Keep in mind the key dates, start early and plan in contingency

Shout about it ... in as many different ways as possible

- We are making sure ALL staff are informed
- We have updated our Intranet
- Progress is discussed at UK Board meetings and International Business Review meetings
- We update staff regularly and share progress

**It is important to continually remind staff of their role in compliance
– it isn't just the IT department's responsibility**

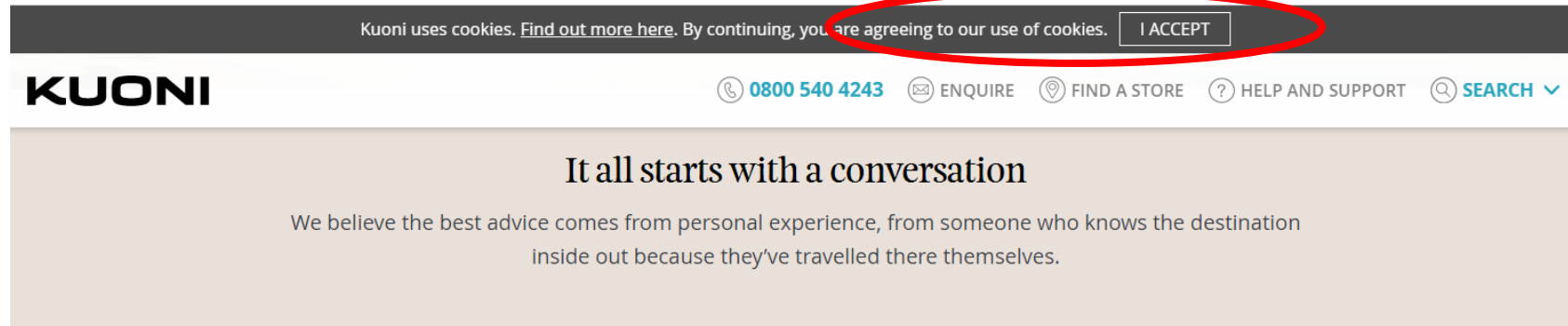
Know your data ...

Salutation	First Name	Surname	Postal Address	Post Code	E-Mail Address
N	N	Y	Y	Y	N
N	Y	Y	N	N	Y
N	Y	Y	Y	Y	Y
N	Y	Y	Y	Y	Y
N	N	N	N	N	N
Y	Y	Y	Y	Y	Y
					Y
	N		Y	Y	N

- Performed an information audit; what personal data is stored and in what application
- Identified Application owners
- Logged personal identifiable data types in conjunction with application owners
- Defined the data input / output of the applications

Keeping track of where data is stored and how it interacts is vital

Identify how data topics are being communicated to customers ...



- Reviewing current privacy policy and documenting what updates are needed and plan to get legal sign off of any changes
- Working with various departments to ensure consent statements are consistent and unambiguous
- Are working on ensuring that it is clear how customers can unsubscribe (whilst protecting business interests)
- We are looking into developing a permissions centre

The key is clear and unambiguous customer communication and the ability to demonstrate that we have actioned their request

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Not just us ...



- We are having two-way conversations with suppliers to understand what changes they are making to ensure compliance
- It is our responsibility to ensure they are aware of GDPR
- We need to review their roles; data controllers, data processors or both?
- When specifying requirements with in-house & 3rd party development teams we ensure that GDPR compliance is included
- Beyond the EU. Is your data in the cloud? Do you know where your data is stored ...

Our top 5 'be aware' topics ...

	Updating privacy policies on the website, ensuring they are clear, concise and consent functions are thoroughly tested
	Subject Access Request process documented and all staff trained to understand what this is and what to do
	Right to be forgotten and how to ensure this is auditable, especially if this includes 3 rd parties
	Subject Access Rectification and Portability , under which an individual has the right to have inaccuracies updated and have the data in a format that can be passed on, must be actioned within one month
	Children are identified as 'vulnerable individuals' so requires specific protection, make sure capture of this data is justified and well documented

Learnings so far ...

- Perception is that there is still plenty of time ... there isn't!
- There are grey areas still, which can be frustrating and confusing for both IT and business teams
- Document what actions, decisions and changes are being made in order to demonstrate intent to comply, a sort of self-audit
- It doesn't have to be expensive development with bespoke systems

Allow yourself time because not all the answers are immediately available, patience is required

Boring & unproductive work but ...

🏠 > Technology

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UK data privacy breach fines soar to over £3m in 2016

A recent PwC survey found that 90 per cent of chief executive officers globally believe breaches of data privacy and ethics will have a negative impact on stakeholder trust

Josie Cox Business Editor | @JosieCox_London | Wednesday 31 May 2017 14:33 BST | 0 comments



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- **Be relentless and assertive** in discussing the topic so that everyone thinks about data protection
- Create a detailed checklist
- Plan early and build in contingency
- Keep track of where data is stored and how it is used
- Be aware of the whole data chain, talk to your suppliers
- Update your privacy policies and ensure all staff know what is expected of them
- Consider data compliance implications when creating new systems and processes

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Thank you for listening

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