Opportunities and Challenges from the Implementation of the GDPR
Procedures, Procedures and Policies

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CUSTOMER

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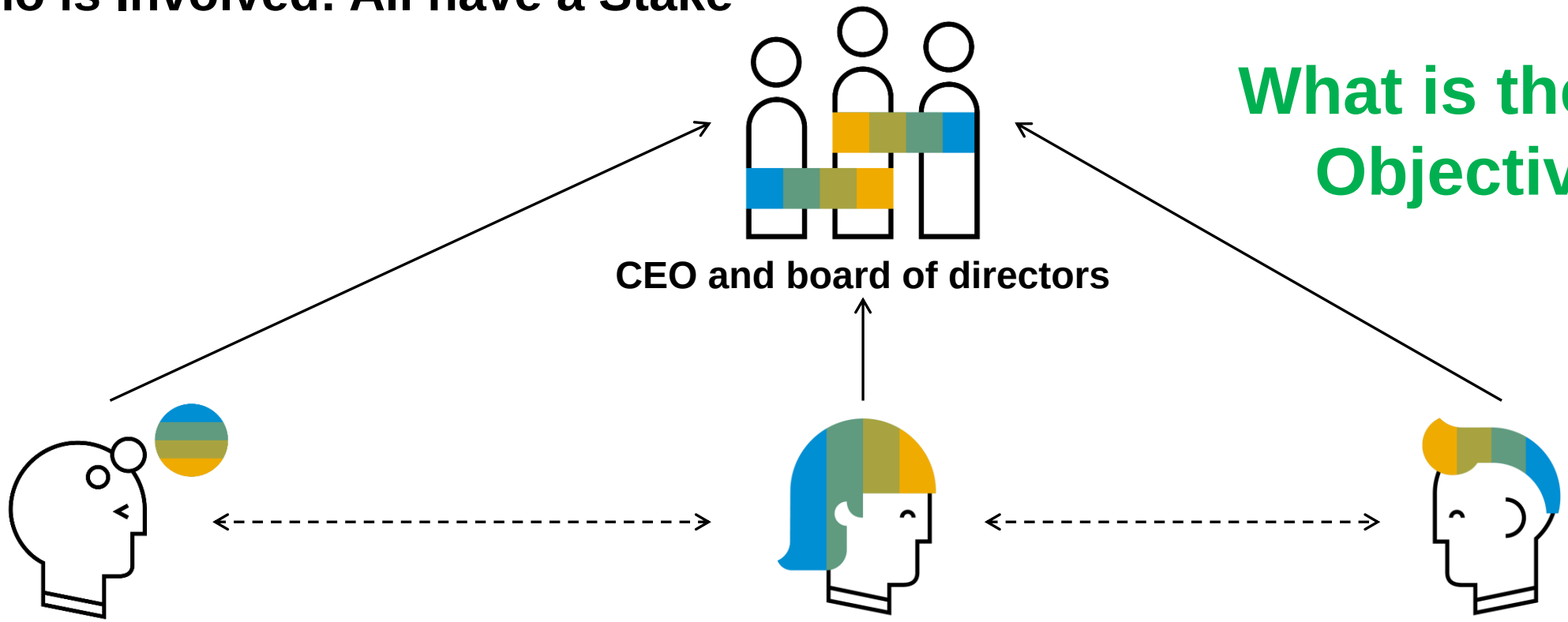
It is the customer's responsibility to adopt measures that the customer deems appropriate to achieve Data Privacy compliance.

What I’m Hearing

Who is Involved: All have a Stake



What is the end Objective?

Legal

- **Data protection officer**
- Chief compliance officer
- Chief risk officer
- Head of legal
- Chief audit executive

Line of Business

- HR
- O2C
- P2P
- Business process owners

IT Operations

- Chief information officer
- Chief information security officer

GDPR Accountability – Fundamental to GDPR and 'New' Requirement

Article 5 lists the 6 principles for processing of personal data:

a. lawful, fairness & transparency
b. purpose limitation
c. data minimisation
d. accuracy
e. storage limitation
f. integrity & confidentiality

The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')

ICO comment on addition of GDPR from DPA:

The most significant addition is the accountability principle. The GDPR requires you to show ***how*** you comply with the principles – for example ***documenting the decisions*** you take about ***processing*** activity.

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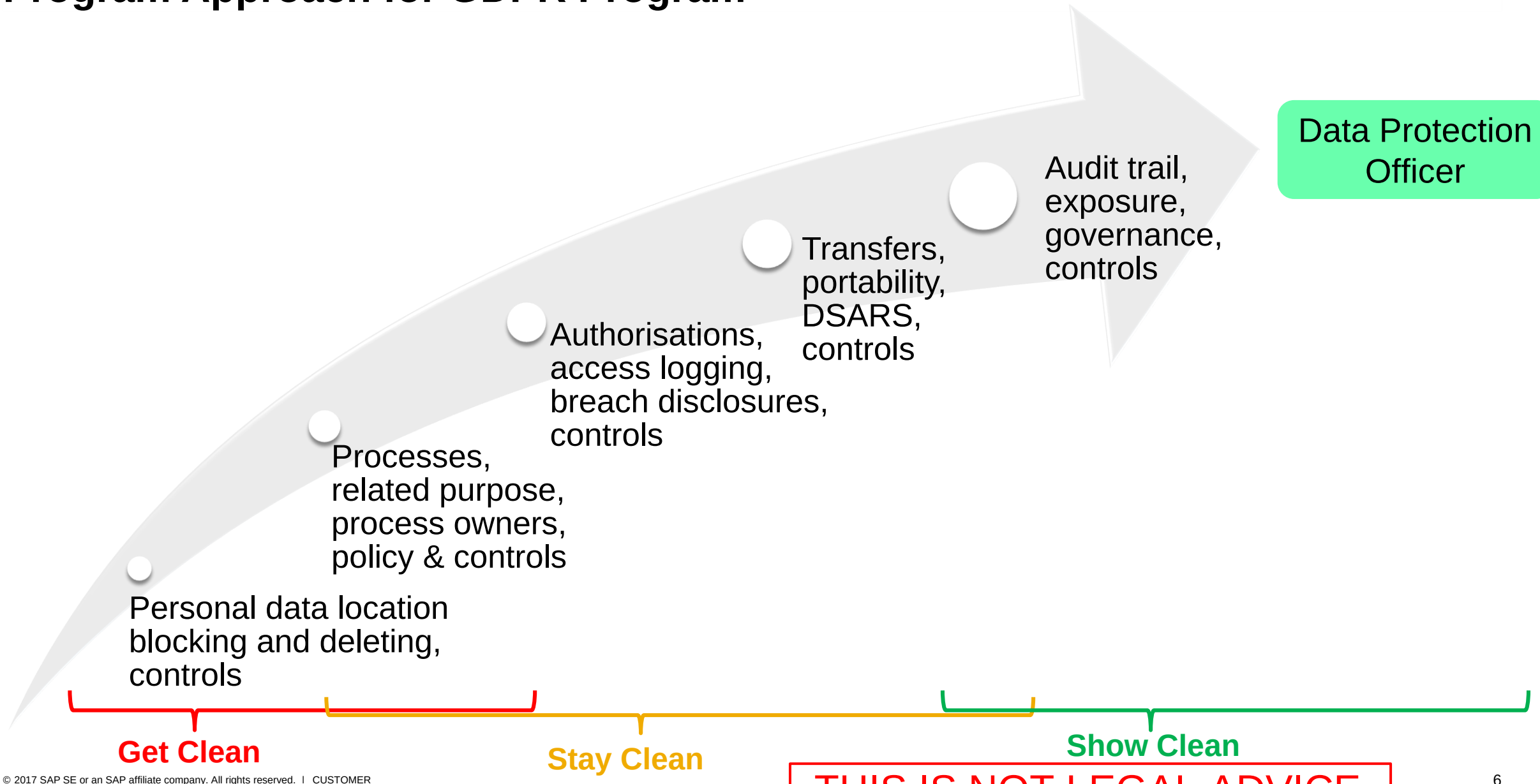
Program Approach for GDPR Program



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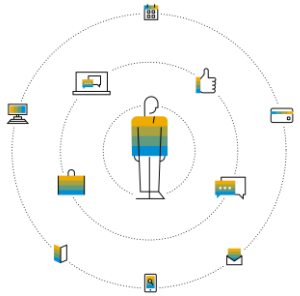
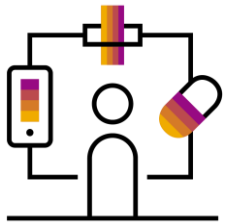
3-Tier Requirements – Enables a Risk-based Approach

DPO, Board

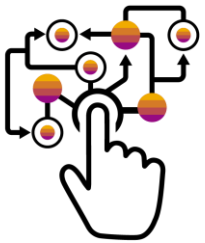
1. lawful, fairness & transparency
2. purpose limitation
3. data minimisation
4. accuracy
5. storage limitation
6. integrity & confidentiality



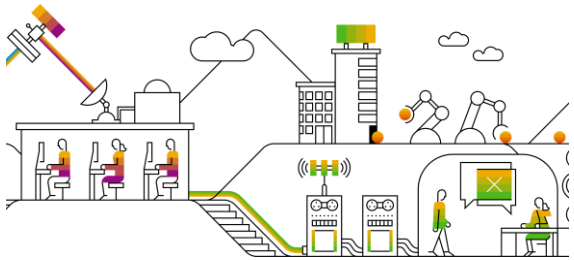


Demonstrate compliance with paragraph 1 ('accountability')

Audit, Governance



Security & availability of processing activities



Documented records of processing activities

IT, Operations

On-prem, all instances

Hybrid & Cloud, all instances

Paper, file stores, all instances

Legal Compliance: Show Clean

- Accountability
- Governance objectives vs actuals, manage by exception
- By design and by default linked to Process Governance

Process Governance: Stay Clean

- Process & purpose register, DPIA's
- Policies and procedures, controls
- LOB process owners & approvals
- Breach handling (for example)
- Linked to Technical Tools

Technical Tools: Get Clean

- Personal data location, type
- Consent & Retention
- Blocking, Deletion
- Encryption, Pseudonymisation
- User authorisations, access alerts

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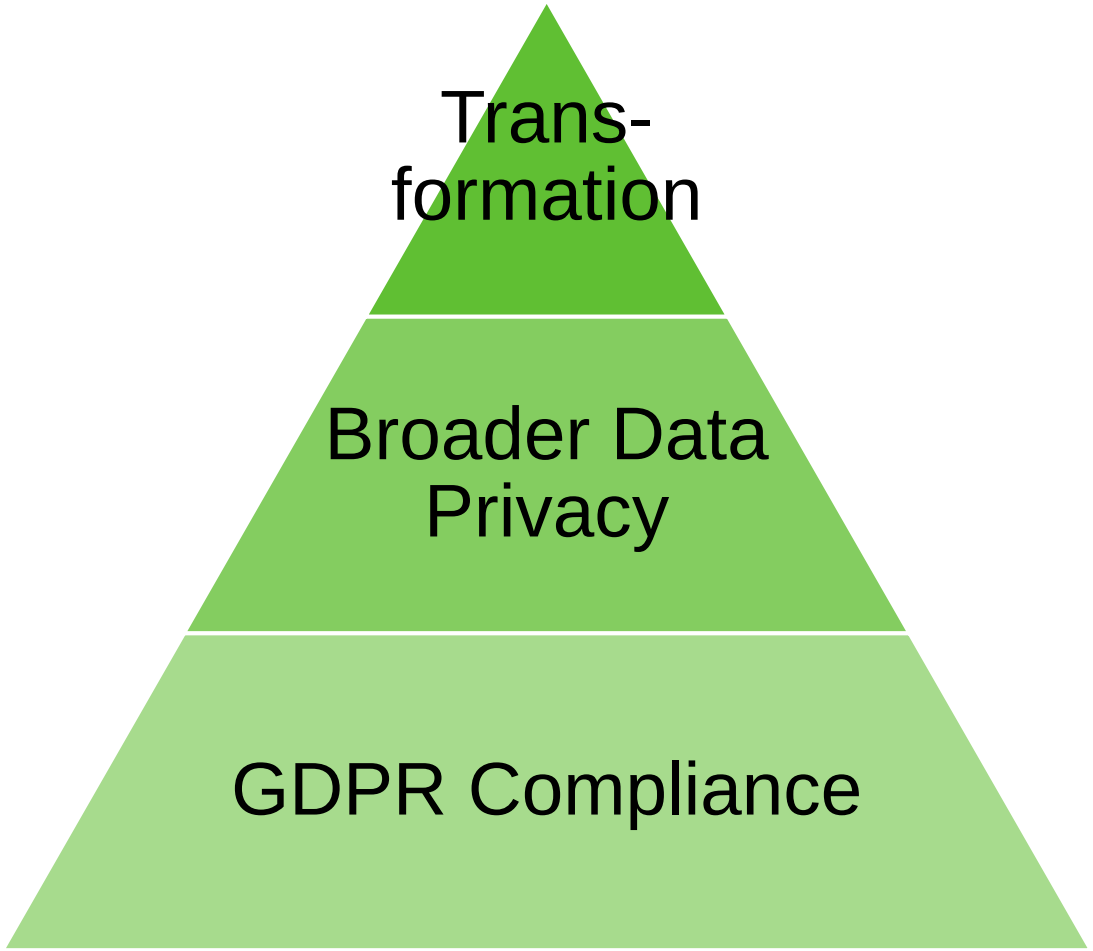

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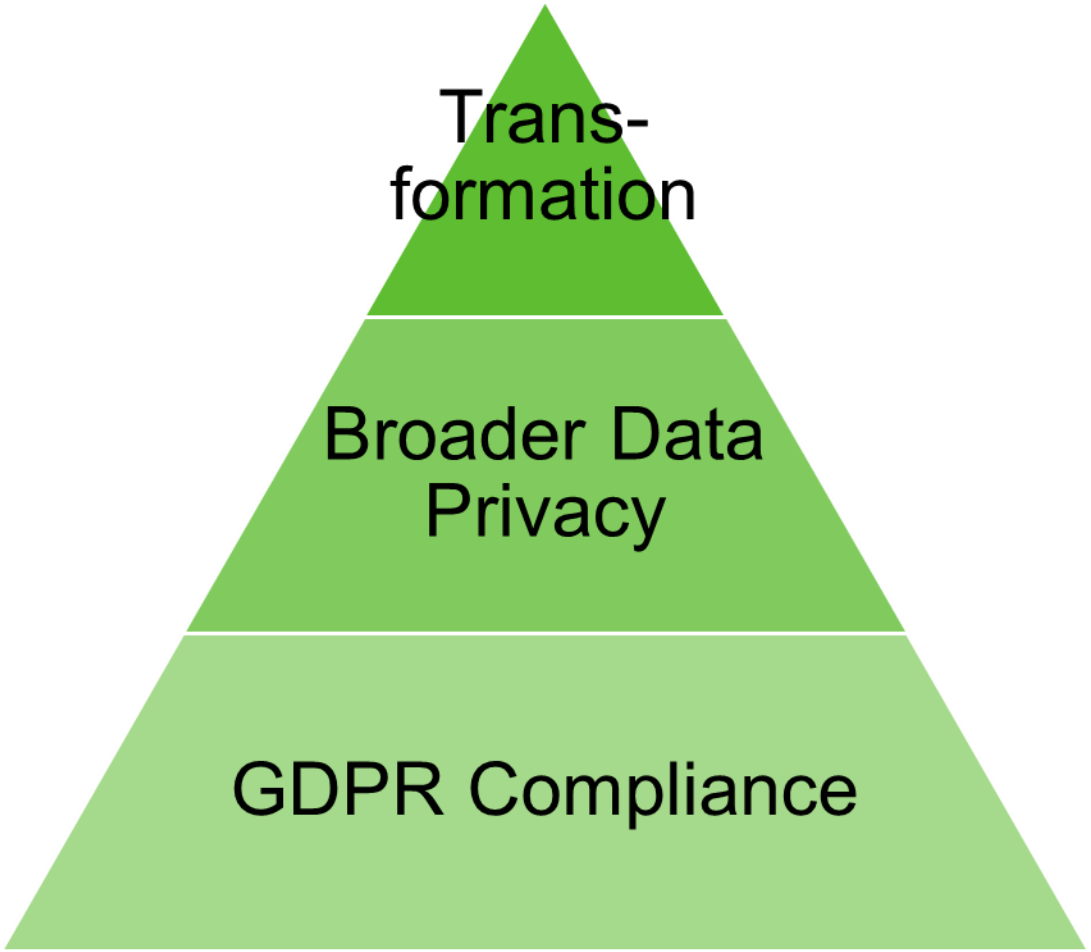

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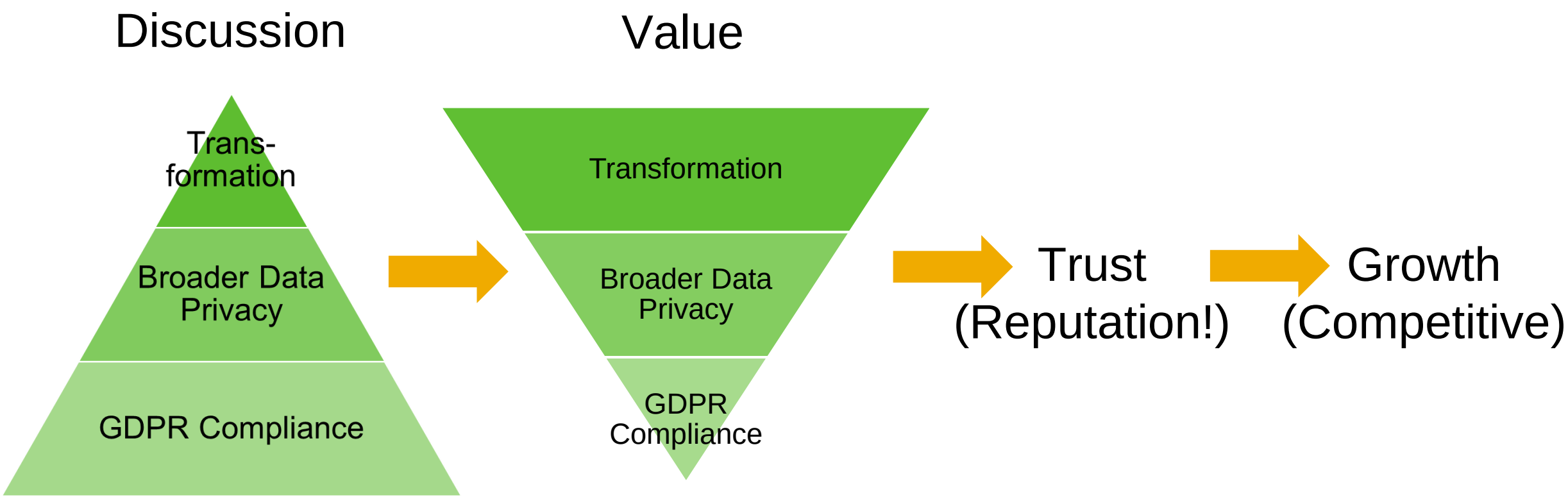

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Thank you.

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