



GDPR COMPLIANCE STRATEGY

The process of meeting GDPR obligations can be boiled down to 5 logical stages:

Planning, Preparation, Implementation, Deployment and Staying Compliant.

COMPLIANCE STRATEGY

“Time to repair the roof is when the sun is shining” - JFK

STAGE 1 Plan		STAGE 2 Prepare		STAGE 3 Implement		STAGE 4 Deploy		STAGE 5 Stay Compliant	
Budget & Resources	Audit	People	The Data	Data Management	Privacy by design	Test & Learn, Refine	Processes	Test & Learn	Impact Assessments
Team	Who, What, Where, Why, How long Identify, Document, Spot the gaps	Roles & Responsibilities	Training	Systems, Processes, Policies & Procedures	Good Governance	Training	Policies & Procedures	Audit & Review	Major changes for the business
Cross-departmental Accountable to the board		Behaviours	Align business plans & strategies	Data Culture	Data Breach Scenarios		Behaviour	Training & Communication	Data breach response plan DSAR response plan

STAGE 1 - Data Audit

"Facts do not cease to exist because they are ignored" - Huxley

Data Audit – Where are the Gaps

Who are our Data Subjects?	What data are we holding?	How is the data stored?	What are we doing with the data?	Have there been any issues?
By Category	Images - Photographs or Video	Personal Data?	Protection	Remedies
Consider data subject's journey	e.g. contact information	e.g. medical information	Hard copy / Electronic	Trends
	On site / off site	Encryption	Anonymised	Data culture
		Pseudonymisation	Consent	
			Internally	
			Third parties	
			Data minimisation	
			Data destruction	

STAGE 2 - Prepare

"The future depends on what you do today" - Gandhi

Results of the Audit – fill in the gaps

People

The Data

Data Management

Data Culture

Roles

Responsibilities

Resources

Spring clean

Storage

Consent

Systems

Policies

Processes & Procedures

Behaviours

Attitudes

Minimise

Data Accuracy

IT

Privacy Notices



STAGE 3 - Implementation

“Great things are done by a series of small things brought together” – Van Gogh

Rolling out your compliance strategy prior to 25 May 2018

Data Culture

People

Data Management

Test & Learn

Privacy by design

Roles & Responsibilities

Training

Communication

Governance

Review

Seek Feedback

Implement learnings

Ownership

Openness

Align your business strategy

Risk Register

New rules

Our policies, procedures & behaviours

Policies

Procedures

Systems



STAGE 4 - Deploy

“Great things in business are never done by one person. They’re done by a team of people”
– Steve Jobs

From 25 May 2018

Our processes, policies, procedures & behaviours

Lead by Example

Reinforce Messages

Data Management

Data Culture

Behaviours

Corrective coaching

Communication

STAGE 5 - Stay Compliant

“Practice make permanent” – Bobby Robson

Keep talking	Test	Incident Management	Training & Communication	Impact Assessments	Data Management	Keep up to date with current thinking
Board Agenda	Compliance / Data Team	Policies, Procedures & Processes	Scenario plan	Data breach plan	DSAR response plan	Reinforce
Data breaches	Implement Learnings	Large Projects	Strategies	IT	Consent	Re-Audit & Review

GET IN TOUCH

Speak to SA Law's Data & Privacy specialists about the GDPR



CHRIS COOK

Partner, Head of Employment &
Data Protection
chris.cook@salaw.com
01727 798017



JULIE GINGELL

Partner, Director of Marketing &
Business Development
julie.gingell@salaw.com
01727 798010



EMMA GROSS

Solicitor
Employment & Data Protection
emma.gross@salaw.com
01727 798049

FOR MORE INFORMATION VISIT
SALAW.COM/GDPR-GETCOMPLIANT

LONDON | **020 7183 5683**
ST ALBANS | **01727 798000**

