



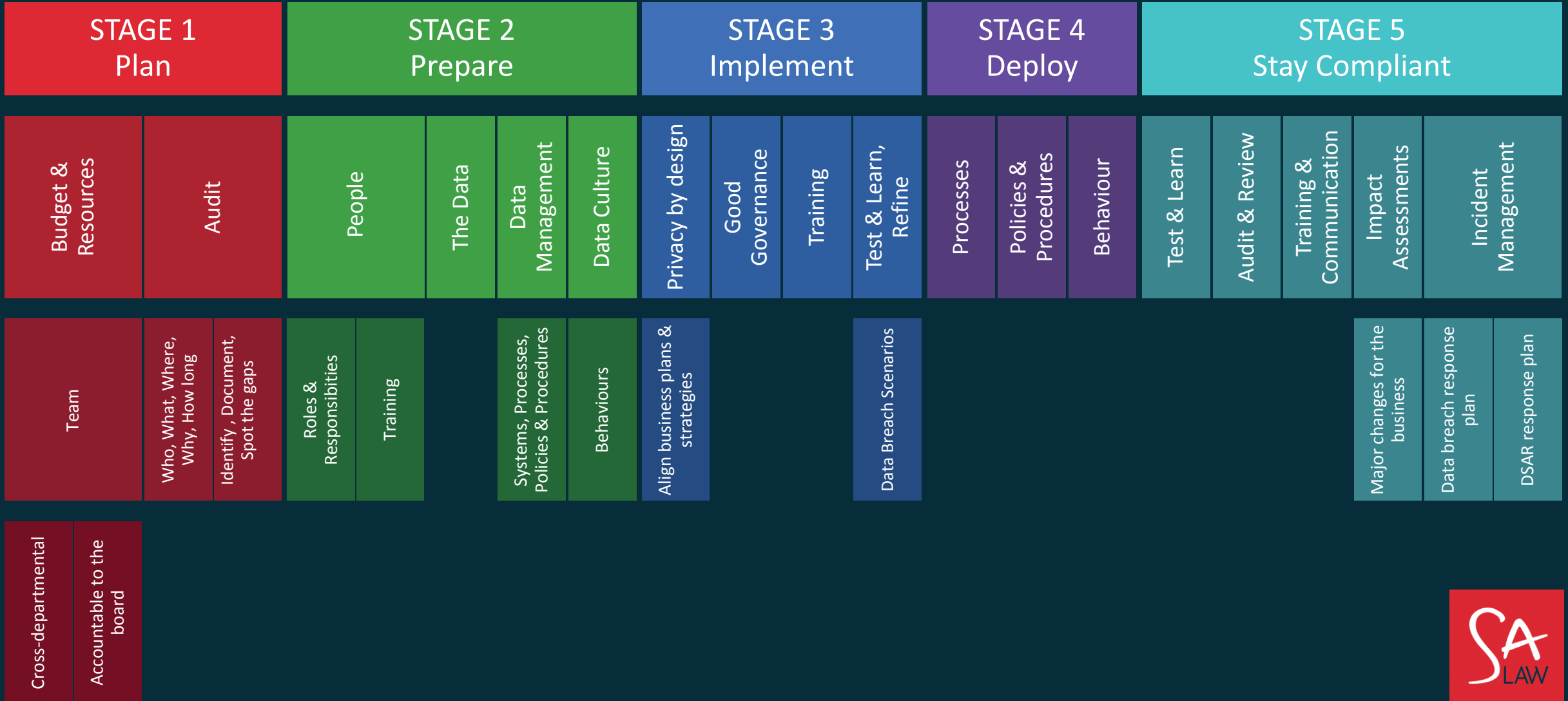
GDPR COMPLIANCE STRATEGY

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 - 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 | Files | How do we use it? | Remedies |
| Personal Data? | Special Categories of Personal Data | Protection | What are we saying we do with the data? | Trends |
| Consider data subject's journey | e.g. contact Information | Encryption | Who do we share it with? | Data culture |
| e.g. medical information | Hard copy / Electronic | Anonymised | How long are we keeping it? | |
| On site / off site | Consent | Pseudonymisation | | |
| 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

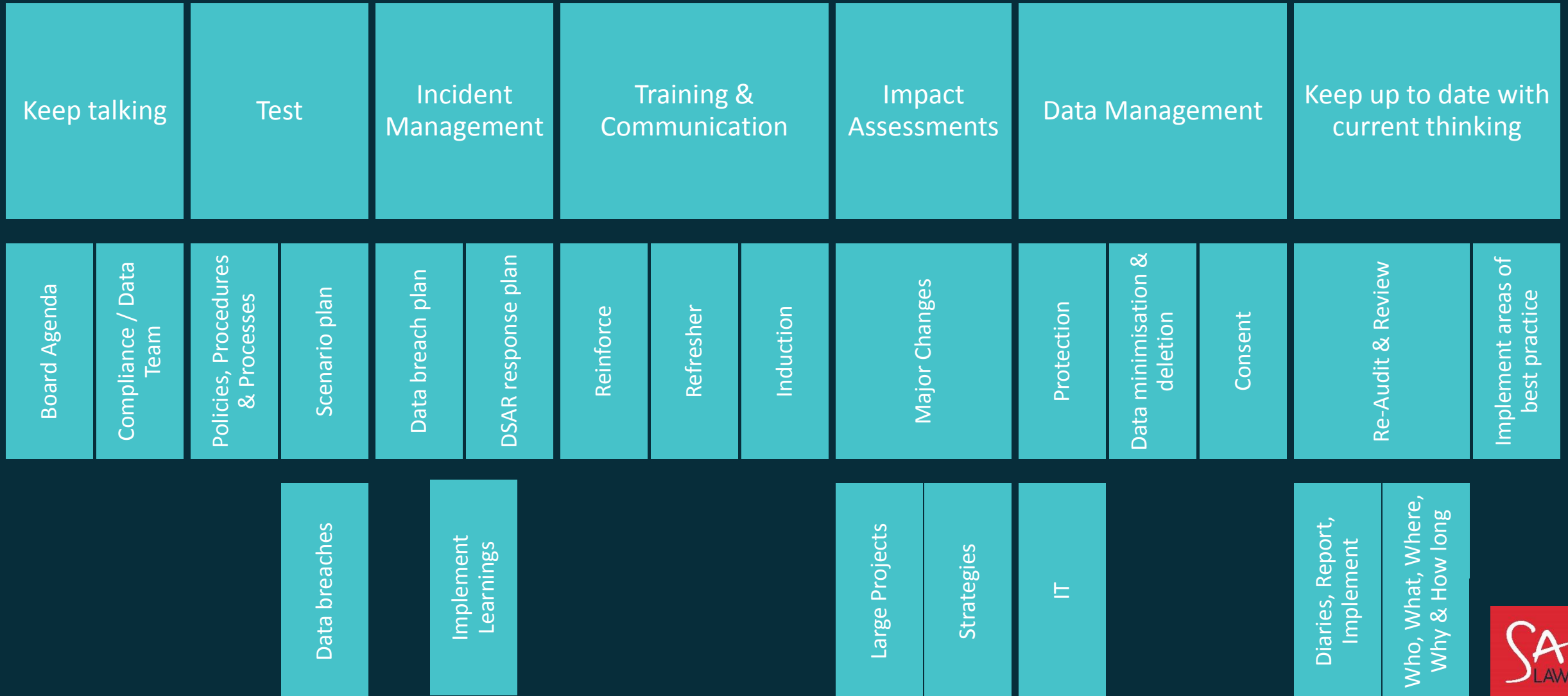
Behaviours

Corrective
coaching

Communication

STAGE 5 - Stay Compliant

“Practice make permanent” – Bobby Robson



GET IN TOUCH

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



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