

# GDPR - What is changing?



- Applies throughout the EEA (i.e., EU + Norway, Iceland and Liechtenstein)
- May apply outside EEA (“offering goods & services” or “monitoring online behavior”)

# Privacy, Legal, JJT, with business engagement, defined a risk based plan

## Policy & Procedure

- Updates to Framework, privacy notices and consent forms
- Policy updates for non digital commercial activities
- New Global Breach Notification and Escalation process
- Data Protection Impact Assessment (DPIA) process
- Documentation of processes supporting compliance

## Data Protection Officer (DPO) / Governance

- Identification of company Data Protection Officer (required by regulation)
- Creation of Data Protection Officer team (leveraging existing Privacy resources)
- Creation of steady state GDPR Governance model

## Third Party Contracts/Data Transfer Agreements

- Updates to contract guidance and template language
- Updated inter-affiliate data transfer agreement
- Integration of privacy evaluation into Business Partner Risk Assessment
- Remediation of contracts

## Awareness and Audit

- Awareness and communication to business
- Internal audit, testing & monitoring strategy and plan

## Systems Remediation

- Regulation translation to high level JJT requirements
- Identification of in-scope websites, mobile applications and business applications
- Remediation of websites and applications

## Enabling Technology

- Tool for Data Protection Impact Assessment and Records of process activities
- Update to Business Partner Risk Assessment Tool

# GDPR Risk Profile

## GDPR increases risk:

- Substantially higher fines
- More coordination and collaboration in enforcement
- Data subject rights allow for more “activist” enforcement
- Notification of breach requirements increases visibility to regulators
- Uncoordinated country guidance undermines harmonization
- Late guidance from authorities and complexities of implementation will result in full implementation beyond May
- Legal uncertainty in certain areas remain: e.g.
  - cross-border data transfers
- Other countries mimic GDPR

## But :

- “May 25 is a starting point, not a deadline”
  - Industry peers have similar progress
- Many Data Protection Authorities struggle with resources