



Shepherd and Wedderburn's data protection lawyers are available to assist your organisation in getting from **red** to **green** by 25 May 2018

Audit Communications

Identify current consent requests and privacy notices. Client and associated entities (group companies, pension scheme etc.)

Prioritise

Prioritise areas to address by gap analysis (e.g. security, marketing, outsourcing, sharing, employee data and any sensitive personal data) and agree any further exclusions from project scope.

Identify Contracts

Identify all third party contracts in place where data is shared or processed. Data mapping – how much is outsourced?

August 2017 to October 2017 Assessment

Overseas transfers

Identify what personal data is transferred, where and why.

Data Discovery

Map flow of data (data solutions architect)

Identify Security

Identify security arrangements for personal data held on client systems, on client premises and on third party systems and premises.

Analyse Current Legitimate Interest Basis for Processing

Identify where legitimate interest is being applied as the legal basis for processing and identify an alternative basis for processing*.

November 2017 to December 2017 Analysis

Third Party Contracts

Draft suitable provisions for future use; re-open or park contracts.

Basis for Processing

Identify alternatives to consent as the legal basis for processing (e.g. legitimate interest) and likely impact on direct marketing.

Breach Reporting

Consider current capabilities and policies.

Ability to comply with data subjects' rights

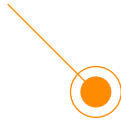
Review current systems and mechanisms for complying with data subjects' rights. Consider changes required for new data subjects' rights.

*Note: Public authorities will be unable to rely on legitimate interests as a basis for processing and will need to rely on alternative provisions in Article 6 of GDPR.



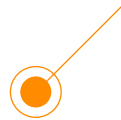
Registers and Records

Create Registers for Consents and Processing Activity (if not already done) and begin to populate with required information.



Data Breach Policy

Draft compliant data breach policy and identify data breach team.



Historical Records

Make decision on whether to retain or delete old records and communications. Where retained, decide on access policies.



**January 2018
to February 2018
Preparation**

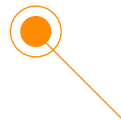
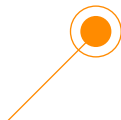


Insurance

Obtain quotes to update insurance policies.

Data Subject Communications

Draft new privacy notices and consents. Draft any necessary communications templates.



Staffing

Recruit Data Protection officer if necessary. Staff training.

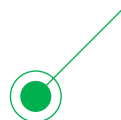
Contracts

Incorporate mandatory terms into contracts where required.



Breach Reporting

Finalise compliant policy and roll out with training.



**Impact Assessments
and DP Health Checks**

Ensure Impact Assessments are up to date. Develop process to integrate compliance into all communications and activities.



**March 2018
and beyond
Implementation**

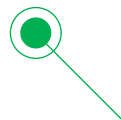
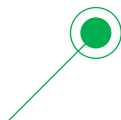


Data Processors

Agree appropriate comfort letters / re-negotiated contracts.

Issue Communications

Advise data subjects of processing and legal basis in detail.



Retention Policy

Develop retention policy across all areas.