



General Data Protection Regulation

What can you expect from the assessment process?

GDPR Readiness Checklist

This checklist will provide you with a detailed understanding of what we will be covering during the GDPR Readiness Assessment. If you don't have any of this in place already, don't panic; we will provide you with training, templates and guidance required.

Awareness:

- We understand how personal data is defined within our country's data protection legislation.
- We have identified whether we need to comply with the new General Data Protection Regulation.

Leadership:

- We have identified who has overall responsibility for security and data protection within our organisation.
- Management consider information security and data protection when reviewing performance.

Policies and Procedures:

- We have procedures in place to mitigate risks.
- We have procedures in place to monitor compliance.
- We have created a personal data and information security training programme for employees.
- We have a Privacy Notice.
- We have identified who is responsible for ensuring compliance is maintained.

Roles and Responsibilities:

- We have identified who is responsible for data security.
- We have a Data Protection Officer (if required).

Data Mapping:

- We have completed a data analysis.
- We have completed a data flow audit.
- We have put processes in place for all of the data that requires protection.
- We have documented where the personal data we hold has been obtained from.
- When assets are no longer required, we ensure data is securely wiped or destroyed.

Data Controllers:

- We have put contracts in place for our data processors.

Data Processors:

- We have put contracts in place for our sub-processors.

Risk Assessments:

- We conduct risk assessments for data privacy.
- We ensure data is encrypted before being stored or accessed by our public cloud provider.
- We ensure our public cloud provider securely stores the data we share and hold.
- Consent is obtained before personal data is stored outside of the European Economic Area (EEA).

Privacy Impact Assessment:

- We carry out Data Protection Impact Assessment (DPIA) when required.
- We consider data privacy when starting new projects to ensure that data is considered and protected, as part of the initial design.

Subject Rights:

- Data Protection is referenced within our employee contracts.
- Our policies and procedures clearly explain responsibilities for handling personal data.
- We collect personal data in a fair, lawful and transparent manner.
- We ensure data notices can be easily accessed by data subjects.
- We obtain parental consent when subjects are under 16 years.
- We are able to respond to Subject Access Requests (SAR's) within appropriate time-scales.
- We ensure data is accurate and kept up-to-date.
- We can delete data subject's personal data, when required.
- We can stop processing personal information, when required.
- We can provide electronic copies of an individual's personal data, when required.
- We have a complaints and appeals procedure.

Legal Basis for Processing:

- We document the legalities surrounding the reasons why we obtain personal information.
- We record the ways in which we obtain consent for the purpose of demonstrating compliance.

Data Security:

- Personal information is handled in a way that is appropriate to its sensitivity and confidentiality.
- We ensure the level of data access granted to employees is appropriate to their position.
- We complete security assessments.
- We document security breaches involving personal data and report this, where appropriate.

Data Processing:

- We ensure personal data is relevant and adequate for the organisation's purposes.
- Our Data Privacy Statement includes a point of contact for issues concerning data protection.
- Data subjects are able to revoke consent for data obtained.
- We record the reasons why personal data was obtained.
- Our contracts state whether we are acting as the data controller or data processor.
- Our security policy is detailed within the relevant contracts.
- Privacy impact assessments are carried out on new systems and projects where personal data is used.

Performance:

- We record which processes/policies/technologies need to be monitored.
- Senior level management review the output of monitoring activities.

Continual Improvement:

- We identify nonconformities to help us continue improving our Privacy Management System.